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April 11, 2025

Chairman Brendan Carr
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: In the Matter of Delete, Delete, Delete; GN Docket No. 25-133

Dear Chairman Carr,

Nexstar Media Inc. ("Nexstar") supports the Federal Communications Commission's ("FCC" or "Commission") commitment to "alleviating unnecessary regulatory burdens."[1] Attached for submission in the record of this proceeding are letters from certain stations that Nexstar owns or has relationships with urging the Commission to eliminate television ownership regulations.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Kathleen A. Kirby
Kathleen A. Kirby

Counsel for Nexstar Media Inc.

[1] Press Release, FCC, FCC Chairman Carr Launches Massive Deregulation Initiative (Mar. 12, 2025), https://tinyurl.com/yc7fx6ck; *see also In Re: Delete, Delete, Delete*, Public Notice, DA 25-219 (rel. Mar. 12, 2025).

WTEN-TV & WXXA-TV, 341 Northern Blvd, Albany, NY 12204

Jerry Brehm

Vice President & General Manager

Dear Chairman Carr

On behalf of WTEN-TV & WXXA-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission(FCC) to eliminate the current rules that: (1)place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

October of 2023 marked the 70th anniversary of WTEN-TV and in August 2022, market the 40th anniversary of WXXA-TV. Both of those by themselves, would be an incredible feat. We are so proud of what we have accomplished here in the Albany market and what we represent, as the true news leader, community supporter, in the market. Consider some of the events that happened and if there wasn't LOCAL NEWS from WTEN-TV, to assist in providing information to the community. During the Covid outbreak, it was WTEN-TV airing and providing the daily briefing from the Governor's office and resources available to our community on our air - which we provided at no cost. Every day we did this to help protect and inform our community. We cover and provide valuable information and coverage of the countless northeast storms to help inform our community.

We provide over 65 hours of local programming to our community, free over the air, every week. It's not just the strongest news brand in the Albany market, it's also Empire State Weekly (a locally produced statewide program by WTEN that airs across our sister station at Nexstar throughout ALL NYS TV markets). We are the market leader in political coverage, we have produced LOCAL programming on the Fentanyl crisis and how it's impacting our citizens, we hold an annual "Coats for Kids" event that provides warm winter coats to the children in our community, we hold an annual "Backpack Give-away" that provides 1,250 free backpacks throughout our coverage area to needy children and families each and every year. We just completed our 61st year of our telethon that we air and produce for the Center for Disability Services right here in the Capital Region, assisting them in hitting their goal of $100,000 in 2025. We have also helped adopt thousands of pets with our PET CONNECTION franchise, now in its 35th year. Now imagine if the type of commitment softened or worse, went away. Who would cover our community. And we are simply just one market among many threatened by these outdated rules. We have made a commitment to our market, to local news and information and that simply can't go away.

Thank you,

Jerry Brehm

Dear Chairman Carr,

I am writing to you today to emphasize the critical role local broadcast stations play in the communities we serve and to advocate for much needed deregulation that will enable us to compete on a level playing field with digital and technology giants. Specifically, I urge the Federal Communications Commission to eliminate the cap on the percentage of U.S. television households a broadcast company may reach and to lift restrictions on the number of stations a broadcaster may own in a single market. These outdated regulations are limiting local broadcasters' ability to grow, innovate, and effectively compete in today's rapidly evolving media landscape.

At KFDX, we are deeply rooted in Wichita Falls and the surrounding communities, providing essential local news, severe weather coverage, and support for countless nonprofit organizations. Our work is not just about delivering news, it is about serving and protecting our community. Just last week Sheppard Air Force Base was locked down for a period due to a suspected active shooter. During this time viewers were dependent on KFDX for the latest, accurate, dependable coverage. They were also instructed on how to navigate the area during this potentially dangerous situation. This is just one recent example of the critical, real-time information that local broadcasters provide every day across the country.

As local newspapers and radio stations decline or transition to national formats, local television stations like KFDX are increasingly becoming the sole providers of local news. However, the financial sustainability of our industry is being threatened by regulations conceived in an era before streaming technology and digital media dominance. While Big Tech companies enjoy virtually unlimited reach with minimal regulation, local broadcasters remain restricted by outdated ownership caps. These restrictions place us at a significant disadvantage when competing for advertising revenue, audience engagement, and technological investments.

For local broadcasters to continue providing high-quality journalism, emergency information, and community programming, the FCC must modernize or eliminate these restrictions. Doing so would:

- Allow local broadcasters to expand and enhance their local news and community programming, ensuring that viewers continue to receive the critical information they rely upon.
- Enable broadcasters to compete more effectively with digital and streaming platforms that face no comparable limitations on audience reach.
- Improve operational efficiency, ensuring long-term financial stability and continued investment in innovation and new technology.

The media landscape today is vastly different from when these ownership restrictions were first implemented. With the rise of digital platforms, streaming services, and tech giants dominating the media and advertising industries, local broadcasters need the flexibility to adapt and grow. We urge the FCC to act in removing these outdated limitations, ensuring a fair and competitive environment that allows local broadcasters to continue serving the public interest.

Thank you for your time and attention to this critical matter. I appreciate your leadership and commitment to ensuring the continued strength of local broadcasting in America.

Sincerely,

Wayne Reed

Wayne Reed
Vice President & General Manager
KFDX-TV

KIAH TELEVISION
7700 Westpark Dr.
Houston, TX 77063
T : 713-781-3939
M: 713-781-3441
www.CW39.com

April 3, 2025

Dear Chairman Carr,

On behalf of KIAH-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

For almost 60 years, KIAH-TV has been a trusted voice in Houston, Texas, keeping our community informed, connected, and prepared. We take great pride in delivering news that matters—stories that reflect the heart of our city. With over 30 hours of live news and community programming each week, we provide Houstonians with the information they rely on, from breaking news to Amber Alerts and real-time weather updates that help keep our families safe. As Houston grows and evolves, KIAH remains steadfast in our commitment to serving this dynamic, resilient community—because Houston is more than just a place we report on; it's the place we proudly call home.

Beyond the newsroom, KIAH is dedicated to making a tangible difference in Houston by deeply strengthening our community impact through active partnerships with key organizations. Through our collaboration with the Houston Hispanic Chamber of Commerce and the Galveston Regional Chamber of Commerce, we support local businesses and amplify economic growth initiatives. Our work with the American Heart Association includes promoting heart health awareness and participating in community wellness events. By partnering with the City Wide Club, we assist in organizing food and clothing drives for families in need, while our involvement with the Houston Food Bank helps combat food insecurity through donation drives and volunteer efforts. Additionally, our support for the Boys & Girls Club extends to mentorship programs and youth development initiatives, ensuring that Houston's next generation has the resources and guidance they need to succeed. These efforts allow us to go beyond

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broadcasting, creating real, lasting change through hands-on service and community engagement.

In a time when reliable, local news is harder to come by, KIAH stands as a pillar of information, connecting Houstonians with the stories, updates, and services they need to navigate our rapidly changing world. With local newspapers and radio stations facing closures and cutbacks, the role of local broadcasters has never been more crucial. For decades, the Houston Chronicle dominated the local print space, reaching over 500,000 daily readers at its peak. However, since 2009, its circulation has declined by more than 70%, dropping to just 142,785 by 2023. As these traditional media sources diminish, KIAH has stepped in to ensure critical local news and emergency information remain accessible to our community. Without regulatory relief, we will struggle to make the necessary investments to sustain the high-quality journalism and programming our viewers need.

The original ownership restrictions on broadcast stations were designed to promote competition in an era when streaming technology didn't exist and major networks dominated television. However, with the rise of streaming platforms, digital content providers, and Big Tech giants, local broadcasters like KIAH now face significant disadvantages. These digital platforms operate without the same regulations, allowing them to dominate the media landscape while local stations remain constrained.

The reality of today's media environment demands a re-evaluation of outdated regulations that no longer reflect current market conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive landscape that benefits both local broadcasters and the communities we serve.

Thank you for your time and consideration.

Sincerely,

Humberto Hormaza
Vice President & General Manager
KIAH-TV Houston, Texas

KLFY 10 NEWS ACADIANA'S LOCAL NEWS LEADER
1808 Eraste Landry Road Lafayette, LA 70506 | 337-981-4823

Chris Cook
Vice President / General Manager
KLFY-TV
1808 Eraste Landry Rd.
Lafayette, LA 70506
337-654-5695
ccook@klfy.com

4/2/2025

Subject: Urgent Call for FCC Action – Eliminate Outdated Media Ownership Rules

Dear Chairman Carr,

Local journalism is at a breaking point. On behalf of KLFY-TV in Lafayette, I urge the FCC to act now and eliminate outdated regulations that:

1. Cap the percentage of television households a broadcast company may reach.

2. Limit the number of stations a broadcast company may own in a single local market.

These rules, written for a media landscape that no longer exists, are crippling local broadcasters while Big Tech—unregulated and unchecked—continues to dominate news and advertising. Every day, these digital giants siphon away audience and ad dollars, weakening the very stations that provide the most trusted source of local news and emergency information.

KLFY is more than just a TV station—we are a lifeline for South Louisiana. As Ben Broussard, Chief of External Affairs at Catholic Charities of Acadiana, stated:

> "KLFY has been an invaluable partner to Catholic Charities of Acadiana... Their commitment to local journalism has helped mobilize critical support during times of crisis... In an era where natural disasters are increasing in both frequency and intensity, KLFY has played a crucial role in keeping our community informed and connected. Their coverage has helped rally resources, volunteers, and critical aid when Acadiana has needed it most. Their work ensures that the most vulnerable in our region are not forgotten, and for that, we are deeply grateful."

Over the past year, we have provided critical coverage of hurricanes and severe storms, delivered essential election reporting, and helped raise millions for local causes. When disaster strikes, when lives are on the line, when our community needs real, on-the-ground reporting, KLFY is there. The

KLFY 10 NEWS ACADIANA'S LOCAL NEWS LEADER
1808 Eraste Landry Road Lafayette, LA 70506 | 337-981-4823

same cannot be said for Big Tech platforms, which operate with no real connection to the communities they profit from.

The stakes could not be higher. As newspapers disappear and local radio stations cut back, the responsibility of informing and protecting the public increasingly falls on local TV stations. Yet, we are being strangled by outdated FCC rules that limit our ability to grow, invest, and compete. These regulations, written before streaming even existed, are now doing more harm than good.

Without immediate action, local television as we know it is at risk. The consequences? Less local news, fewer emergency alerts, and a widening gap in trusted journalism—all while Big Tech faces zero restrictions. This is not just an issue of fairness; it is a matter of public interest and public safety.

To protect the future of local broadcasting, the FCC must act decisively to: • Remove arbitrary ownership caps, allowing stations to expand and better serve their communities. • Level the playing field so broadcasters can compete with digital platforms that currently operate without restriction. • Ensure financial stability for local stations, enabling continued investment in high-quality journalism and technology.

The time for debate is over. The reality is clear: local broadcasters are fighting for survival under regulations designed for a world that no longer exists. The FCC must take immediate action to modernize these rules before it's too late.

Sincerely,

Chris Cook

Chris Cook
Vice President / General Manager
KLFY-TV

Dear Chairman Carr,

As Vice President/General Manager of WIAT-TV in Birmingham, AL, I write to you today to address the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. These outdated regulations hinder the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace. A few giant platforms, with no meaningful connection to local communities across our country, now dominate the media landscape.

At WIAT-TV in Birmingham, we are proud of our long-standing involvement in the local Central Alabama community. From our commitment to fair, balanced local news coverage with over thirty-two (32) hours of regularly scheduled news and community affairs programming each week, to breaking news and severe weather coverage, the employees of WIAT-TV dedicate themselves to the service of our neighbors, friends, and families throughout the region.

Throughout the year, WIAT-TV commits countless hours of time in support of charitable organizations which depend on our support for their survival and growth. In just the past year, our team has served and supported local organizations such as the Big Brothers Big Sisters of Greater Birmingham, the Ronald McDonald House Charities of Alabama, the Leukemia & Lymphoma Society of Alabama/Tennessee Region, and the Community Food Bank of Central Alabama to name just a few. As a local television broadcaster, WIAT-TV is truly part of the fiber of this region.

Like local communities across America, television viewers in Central Alabama depend on WIAT-TV, and the other television broadcasters in our area, to provide them with important, and, at times, life-saving information. From news, weather, and sports stories of the day to lifesaving emergency information during one of our frequent severe weather events in the spring and fall, local television stations remain the first place our viewers turn for local news and information. Local television stations are the most trusted source of local journalism.

As local newspapers and radio stations go out of business or severely limit their operations, the role local broadcasters play in communicating information is more important than ever. In our area, the Birmingham News is just one example of newspapers across America who no longer exist as a print publication, forced to sell off property and dramatically reduce staff to survive as a shell of their past.

Today, local television stations like WIAT-TV are suffering from the archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will simply be unable to continue the level investment necessary to produce timely, high-quality news and information programing most relevant and critical to our viewers.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting. But these restrictions were conceived at a time when streaming technology did not even exist. Those days have passed. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WIAT-TV Birmingham are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America.

To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts. Local broadcasters need, not want, this flexibility for the sake of survival.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment requires a reconsideration of legacy rules that no longer reflect the urgent situation created by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

With kindest regards,

Wm. James Cromwell
WIAT-TV Birmingham – Tuscaloosa – Anniston, AL
Vice President & General Manager

Dear Chairman Carr,

On behalf of KRBK-TV and KOZL-TV in Springfield, Missouri, I am writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KRBK and KOZL, we are deeply involved in the local community. KRBK is a FOX affiliate and KOZL is a MyNetwork affiliate.

In 2024, KRBK was awarded Broadcast TV Station of the Year by the Missouri Broadcasters Association. We received this honor because of our commitment and coverage of local news, weather, and sports. Our newsroom is full of passionate storytellers who hold sacred the job we must do without fear and favor. Springfield is a city situated in what is commonly known as Tornado Alley. As I write this letter today, we are entering our fourth hour of wall-to-wall coverage of a severe weather outbreak across the Midwest. I'm sure this coverage will continue into the night. Our chief Meteorologist is a long-time veteran in the industry and this market. He and his team of meteorologists are a trusted source of weather information. The weather team has won the prestigious "Most Accurate Forecast" award for 8 straight years. Covering severe weather is not just about informing the public before and during a storm, it's also about getting into the communities impacted by the storm as we did this morning when a tornado struck the town of Nevada, Missouri.

We have an award-winning investigative anchor reporter focused on uncovering hidden information, holding the powerful accountable, investigating allegations of wrongdoing, giving a voice to the voiceless, and getting results for our viewers. She's done that through in-depth research, analysis of public records, digging into the 'why' of stories, and asking tough questions.

Every year, our viewers rely on us to deliver election coverage for local, state, and national races. It's an incredibly important responsibility, especially right now, with divisive politics making headlines every day on television and social media. Our viewers count on local media to deliver facts, unbiased reporting, and transparency. In 2024, we produced and broadcast a United States senatorial debate. Because this debate was carried over our free over-the-air signal it was accessible to all viewers in our market.

Across our Springfield station group, we broadcast 54.5 hours of news per week and our local commitment runs deep. For example, we produce a weekly franchise called "Serving the Ozarks". The stories we cover with this franchise highlight local non-profit organizations and first responders in the viewing area. Twice a year, we're part of a food

drive to help families who rely on local food banks for meals. That drive is called "Putting the Ozarks First". It provides thousands of meals to families who cannot afford groceries for their children. Once a year in June, station employees are given time off to volunteer in the community. It is called "Day of Caring". As a group, we select a community service project and spend the day working alongside a local organization.

When it comes to special programming, we produce many local specials featuring events like the annual Christmas and St. Patrick's Day parades. We produce 30-minute specials every year to celebrate Black History Month, Hispanic Heritage, and Memorial Day with a program we call Veterans Voices. Each year we celebrate women with an initiative called Remarkable Women.

Like most small to medium-sized communities, local print media has diminished. Here in the Ozarks, the local newspapers have very few local reporters. As for Radio, their news and weather departments have all but gone away. In fact, we provide weather updates for all three radio groups in this market and daily news updates for one radio group in this market. As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KRBK/KOZL are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics.

We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Chris Pruitt
Vice President & General Manager

2650 East Division Street, Springfield, MO, 65803 (417) 862-1010

April 3, 2025

Dear Chairman Carr,

On behalf of WCIA-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WCIA, we have been deeply involved in the local community for over 70 years. We take immense pride in being the most trusted local leader across all Central Illinois. Serving over thirty-three counties, our viewing area spans east to just over the Indiana border, north to Kankakee, west to Springfield and south to Effingham. Each week, we produce over 50 hours of news and community-focused content through our various local newscasts, Capitol Connection, and our local lifestyle show, ci Living. Our station is committed to keeping our community informed with breaking news, lifesaving severe weather coverage and being the official television station of Illini sports.

In addition to our newsroom, WCIA has been an integral part of the community dedicated to supporting charitable organizations and community events. Each May, we partner with Operation Honor Guard, raising money for veteran service organizations that provide military funeral rights for fallen veterans. In June, we partner with United Way and the BottomLine Diaper Bank, ensuring that all families in our community have enough diapers to keep their babies healthy. In December, we partner with Toys for Tots, ensuring that thousands of children in our community wake up with a toy on Christmas morning. In February this year, we partnered with the Illinois Treasurer to help viewers find their unclaimed property in the amount of $1.2 Million. In addition to these organizations, we support a variety of other organizations throughout the year, depending on the needs of our community.

We also honor and celebrate the people that make up our community. Examples include producing news stories and local specials that celebrate Black History Month in February, Women's History Month in March, and Hispanic Heritage month in September. Additionally, we honor our area teachers, blue collar workers, farmers, and healthcare workers with unique local coverage. During the summer months, we highlight the people and stories in the smaller towns that make up our viewing area. All this demonstrates WCIA-TV's commitment to the communities and people we serve, keeping them informed, entertained, and protected.

Television viewers in communities across the United States depend on their local TV stations to provide them with essential information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like WCIA are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WCIA-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Angie Salas

Angie Salas

Vice President & General Manager

WCIA-TV Champaign, IL

April 4, 2025

Dear Chairman Carr,

On behalf of WETM, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WETM we are deeply involved in the local community…
We provide over 27 hours a week of live local news to the Twin Tiers. When severe weather moves into our area. our viewers can count on us for the details they need to keep their family safe. We share inspiring stories of athletes in our sports coverage. Each week, our show Talk of the Tiers features community leaders for an in-depth discussion. WETM also airs many special programs such as Congressional Debates, Mayoral Debates and Forums with Sheriffs of counties within our viewing area to discuss public safety.

Since 1956, WETM has taken pride in being a part of our community. Each year, we work with the American Red Cross sponsoring two of their largest local Blood Drives. We hold a telethon with a local charity that raises money for Christmas gifts for Children. We also partner with organizations for various projects throughout the year including The American Cancer Society, the Food Bank of the Southern Tier, The American Pride Ride. Strong Kids Safe Kids, the Economic Opportunity Program, Compeer, Potter's Hands Foundation, local animal shelters and more. Whether it be in a fundraising event or sponsoring a community event, we aim to make the Twin Tiers a better place to live.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content

providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WETM are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tina Marie Castano
Vice President & General Manager

Dear Chairman Carr,

On behalf of FOX44, WFFF in Burlington, Vermont, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WFFF went on the air in 1997 to bring FOX programming to Vermont, Northern New York, and a small region of New Hampshire. From the start, FOX 44 has been involved with the community sponsoring numerous events throughout the year. We work with the local branches of The Red Cross, American Heart Association, American Cancer Society, MS Society, and numerous local non-profits to help support the three states. WFFF also partners with radio stations and other businesses to keep the local economy thriving.

In 2007 we added our first newscast. Over the years since we have added several additional news programs. We now air over 16 hours of news programming every week. We recently added a news bureau in Plattsburgh NY to ensure coverage of for our north country region. Our local viewers and viewers in communities across the United States depend on their local TV stations to provide them with valuable information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

In addition to regular newscasts, WFFF covers breaking news, severe weather emergency notifications, Amber Alerts, and critical press conferences. During the pandemic we broadcasted daily updates live from multiple state governments. Without broadcast television, this vital information would not get to the rural parts of our states. As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like ours are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the

advertising and media distribution sectors, local broadcasters like WFFF are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tina Marie Castano
Vice President & General Manager

Dear Chairman Carr,

On behalf of WIVT-TV/WBGH-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WIVT-TV/WBGH-TV we provide the most hyper-local news coverage in our community. We are truly "Putting Local First." Over the years, our area has experienced severe weather events like flooding and tornadoes, and our stations have been there to provide important life-saving information. At these critical moments, viewers rely on the familiar faces and trusted voices of the News 34 on-air team. With extreme weather events increasing, this need will only continue to rise. Another example would be during the COVID crisis, when our stations provided the daily information to keep viewers safe and informed. But our commitment to the local community goes well beyond moments of crisis. Day to day, we are a partner with the local business community, supporting job creation and growing our local economy. Throughout our broadcast day, we devote airtime to help with local issues like food insecurity, homelessness, and traffic safety. Our stations also champion the good in our community, with support for the arts and our annual Remarkable Women campaign. These are just a few examples of the significant role WIVT-TV/WBGH-TV play in the local community.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations know their communities and are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large

platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WIVT-TV/WBGH-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tina Marie Castano

Vice President & General Manager

April 2, 2025

Dear Chairman Carr,

On behalf of WNTZ, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

At WNTZ we are deeply involved in the local Central Louisiana community. We have numerous employees that are committed to improving the lives and wellbeing of the community we work, live, and raise our families. All of us participate in organizations such as the United Way, The Extra Mile, The Alexandria Zoo, The Mana House, the local chapter of The American Heart Association and the American Cancer Society, among others. We not only serve on the boards and/or committees, but we volunteer 100's of hours annually and the station commits countless hours to airing PSA's as well as airtime promoting the organizations and their fundraising campaigns. Because we are a local media organization, we are in tune with the community's needs and respond to those needs.

Our local station has real relationships with our community and our viewers. Our viewers can call and speak to a local employee with any issue they are having. Viewers are not transferred to a person located in another state or sometimes another country, they are speaking to a "neighbor." I have spoken with people that need a recommendation on a new OTA antenna, help on how to reprogram their new TV and sometimes it is just a question on when a new program will be airing.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role of local broadcaster has become even more important. Still, local stations like us are suffering because of antiquated FCC rules and regulations that are not based on today's media reality. Without relief the local broadcaster will be unable to deliver the level of quality local information and services our communities count on.

The ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist and the Big 3 broadcast networks dominated the airwaves. Those days are in the distant past. Now there are streamers, digital content providers, and Big Tech giants that dominate the airwaves and reach households without all the restrictions placed on the local broadcaster. Local broadcasters are at such a disadvantage compared to Big Tech because of outdated regulation restraints.

Eliminating or modernizing these regulations would:

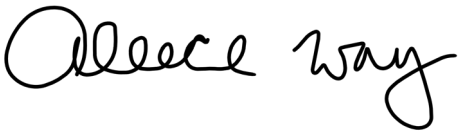
201 Johnston Street, Suite 305
Alexandria, Louisiana 71301
318-443-4700

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in innovative technology, and viewer services.
- Allow local broadcasters to work within a level playing field with these Big Tech giants.
- Will ensure financial stability by improving operational efficiency and the ability for effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the actuality of today's media environment. We urge the FCC to take swift, decisive action to eliminate these ownership restrictions making certain that the local broadcaster operates in a mutually beneficial competitive environment for the viewer and our local communities.

Thank you for your attention to this important matter.

Sincerely,



Aleece Way

WNTZ VP/General Manager

201 Johnston Street, Suite 305
Alexandria, Louisiana 71301
318-443-4700

Dear Chairman Carr,

On behalf of WTNH-TV and WCTX TV, I'm writing you as part of the proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues rapidly be disrupted, these regulations are hindering the ability of local broadcasters to compete with "Big Tech" in what has become an increasingly fragmented, digital, competitive marketplace dominated by a few tech platforms that have no meaningful connection to our local community.

History of Nexstar: Founded in 1996 with a guiding commitment to localism and innovative associated content and service. In the decades since, kept its commitments while becoming the largest local television and media company in the United States. We continue to grow, the newest acquisitions, News Nation, programming, CW, Sports additions, The Hill. In CT we produce approximately 70 hours of local news in CT and over 70 journalists providing 24 hr. news coverage for our state alone while the NXST nation has over 5500+ journalists and thousands of employees proudly providing content for reporting that is fact-based, impactful, educational, and unbiased.

Here in Connecticut at WTNH-WCTX, we are deeply ingrained in the local communities we serve.

Every week, we produce over 60 hours of local news and community-centric content through our various local newscasts and local lifestyle show, CTBuzz, and two locally produced political shows the Capitol Report and This week in CT with Dennis House. Our newsroom in New Haven and Hartford bureaus are staffed 24/7 to cover the important, relevant local and regional stories that impact hundreds of thousands of people who depend on us to keep them informed. Our mission is to inform and keep our community safe. WTNH is the oldest broadcast station in CT, 77 years, and was the first broadcast station signed on in CT, and as such we are a reliable and trustworthy part of the Connecticut residents' lives. We have approximately 75 full time experienced journalists that people know trust and welcome into their daily routines to provide critical information.

Some examples of critical local coverage we provide throughout the year are:

- opening day special of legislative session
- Health: Hartford Healthcare events --- Black and Red Gala highlighting the importance of health innovation
- Medical Mission-- bringing quality healthcare clinics to the underserved population across the state
- Swim Across the Sound – cancer awareness
- Parades: Greater New Haven St. Patrick's Day Parade, Hartford Puerto Rican Parade, UCONN March to a Championship

- Specials with local impactful stories: Black History Month and Veterans Voices
- Community event support: New Haven Tree Lighting, Goodwill's Fantasy of Lights, Big Connect
- Nonprofits: Community Foundation's "The Great Give" and the Salvation Army's "Day of Giving"
- News 8 community drives: Food Drive and Gr8 Holiday Give (toy collection with Toys for Tots)
- Town Halls:
- Educating Connecticut Feb. 2023
- Mental Health Feb. 2022
- State of Race June 2020
- Debates: Big Gubernatorial Debates last two elections, at Mohegan Sun and Foxwoods. (2022 and 2018) - Senate GOP Primary debate Blumenthal's seat 2022, and 5th District Debate 2022 (Hayes vs. Logan)
- Ukraine crisis Connecticut's Response 2022
- Partner with Red Cross and Salvation Army for annual fundraisers including "Sound the Alarm" and "A Day of Giving"
- Nexstar Media Charitable Foundation which has given hundreds of thousands of dollars to deserving local market organizations.

As local newspapers like the Hartford Courant and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of dated FCC rules and regulations that have no connection to current marketplace realities. Without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WTNH – WCTX TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Sincerely,

Rich Graziano

Rich Graziano

VP GM WTNH WCTX

NEWS8 wtnh.com myTV9

April 2, 2025

Dear Chairman Carr,

On behalf of WDAF-TV/FOX4 in Kansas City, I'm writing as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech;" a few giant platforms that have no meaningful connection to our local community.

In 1949, WDAF-TV became the first television station to broadcast in Kansas City. Over our 75-year history, we have remained steadfast in our commitment to serving the community and delivering trusted news, weather, and sports coverage. We have reported on major events, advocated for local issues, and established station-charted charities like The Band of Angels and The Love Fund for Children. The Band of Angels provides students with instruments and music camp scholarships. The Love Fund fulfills the unmet needs of children across Kansas City. In 2024, WDAF-TV talent participated in over 400 different events in Kansas City, helping raise awareness and funds for local non-profits.

We currently produce 74 hours of live news and programming a week as well as over 10 hours of original programming on our streaming app WDAF+. Our viewers depend on us for life saving weather information as well as local news and information. Just this morning, we were in extended weather coverage as tornadoes touched down in our viewing area.

The role local broadcasters play in disseminating accurate information is more important than ever. Last month, a radio group, which owns three radio stations in Kansas City, was forced to cut two local shows and lay off the hosts. Local broadcasters are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, we will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WDAF-TV are at a distinct disadvantage. To remain viable, we need the flexibility to grow without restriction, just like our Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in modern technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of outdated rules. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tracy Brogden Miller

Tracy Brogden Miller
Vice President & General Manager
WDAF-TV Kansas City, Missouri

NEWS 19 WHNT NORTH ALABAMA'S CW 15

April 4, 2025

Dear Chairman Carr,

On behalf of WHNT-TV and WHDF-TV, I urge the Federal Communications Commission (FCC) to eliminate the current rules that (1) place a cap on the percentage of the country's television households that a broadcast company may reach and (2) limit the number of stations a broadcast company may own in any single local market. As a local broadcaster proudly serving the communities of North Alabama, and like other local broadcasters across the country facing the challenges of a changing media landscape, we remain steadfast in our commitment to serving our local communities. However, outdated regulations hinder our ability to compete against "Big Tech" in an increasingly digital and highly competitive marketplace dominated by a few giant platforms, absent meaningful connection to our local community.

WHNT-TV and WHDF-TV have served the communities of North Alabama for over 60 years. Our commitment to the community is not just in words but in action. When our community needs us most, we are there. WHNT-TV was there during the 2011 tornado outbreak that devastated our North Alabama communities. Each day, we continue to be a trusted source of news, information, and emergency updates. Broadcasting 58 hours of local news per week, WHNT-TV and WHDF-TV are committed to keeping our community informed and engaged. We provide unparalleled local coverage, including breaking news, Amber Alerts, severe weather updates, and in-depth reporting on local events.

In our over 60 years of broadcasting, WHNT takes pride in its rich community service history. We air thousands of annual public service announcements for local charities, and each quarter, we commit our time and resources to broadcasting live events, encouraging the community to donate supplies and funding to support a need in the community. Some of our past charitable partners participating in these live events include our local food bank, our local Make-A-Wish foundation, our local diaper bank, our local blood drive org, our local Nicu foundation, and our local veteran's org.

Our commitment to serving the community is one of many reasons local broadcasting needs your support, but there's more. Viewers across North Alabama depend on WHNT-TV and WHDF-TV to deliver their news, their weather, and emergency information directly impacting their daily lives. Many forms of local broadcasting operations, such as newspaper and radio, have had to scale back over the years, highlighting the critical need for TV broadcasting to continue growing in delivering this vital resource. However, despite our desire to continue serving, we face significant challenges due to outdated FCC rules that limit our ability to compete fairly in today's rapidly evolving media landscape. We need regulatory relief to continue our investment in programming and aiding our community needs.

200 Holmes Ave NW, Huntsville, AL 35801 / 256.535.9220 / Olivia.Pennington@Whnt.com

Streaming technology did not exist when "ownership restrictions" were implemented to promote competition and diversity in broadcasting, and the industry has changed dramatically since the conception of these restrictions. Today, streaming platforms, digital content providers, and Big Tech giants wield vast influence, reaching households across multiple devices without any of the restrictions placed on local broadcasters. The reach limitations imposed on television stations place us at a severe disadvantage compared to these digital giants, who are not bound by the same regulations and continue to dominate the advertising and media distribution landscape.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

The reality of today's media environment demands a reconsideration of outdated rules that no longer reflect current marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Olvia Pennington
Vice President & General Manager
WHNT-TV, WHDF-TV Huntsville, Alabama

FOX40 | KTXL
4655 FRUITRIDGE RD
SACRAMENTO, CA 95820
916-454-4422

April 3, 2025

Dear Chairman Carr,

On behalf of KTXL-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KTXL is deeply involved in the Sacramento-Stockton-Modesto communities that we serve.

We produce over 60 hours of local news, life-saving weather coverage, and community-centric content weekly through our various local newscasts and local lifestyle show, Studio40. Our newsroom is staffed seven days a week to cover the important, relevant local and regional stories that impact hundreds of thousands of people who depend on us to keep them informed. From important governmental meetings, city council, school board and other to local events and campaigns, KTXL-TV is a reliable and trustworthy part of the fabric that makes up the communities our employees call home.

We collaborate with the Salvation Army, American Heart Association, and various local organizations to inform and educate our audience on a diverse range of topics that are significant to them and their families. Additionally, we partner with food banks to organize food drives aimed at replenishing food pantries during times of need.

We recently added a news bureau in Stockton to ensure viewers from all corners of our market have the new coverage they need to keep their families safe and informed.

We are here to honor the history of our region and celebrate the people that make it special. We produce programming on topics such as local Black History, Local Women's History, Hispanic

FOX40 | KTXL
4655 FRUITRIDGE RD
SACRAMENTO, CA 95820
916-454-4422

Heritage, Local Politics. We cover local sports in our communities and produce a Friday night local sports show called Final Quarter to celebrate High School sports in our region.

All this clearly demonstrates KTXL's commitment to the communities and viewers we've served, informed and protected since we first signed on the air 56 years ago in October 1963.

We are trusted community partners.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

We employ local journalists who are critical to our democracy. We cover local news events such as crime & safety, weather safety, events and more. As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of FCC rules and regulations that inhibit our ability to modernize and compete. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KTXL-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

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SACRAMENTO, CA 95820
916-454-4422

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We respectfully encourage the FCC to take swift, decisive action in eliminating the restrictions on media ownership, thereby fostering a fair environment that supports both local broadcasters and the communities they serve.

Thank you for your attention to this important matter.

Sincerely,

Cathy Gunther

Cathy M. Gunther
Vice President & General Manager
KTXL-TV Sacramento, California

Dear Chairman Carr,

On behalf of KAMR Local 4, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KAMR Local 4, we are deeply involved in the local community, to the extent that one of our top pillars and priorities is our community outreach program. We partner with over 25 non-profit organizations each year, including the United Way and the Ronald McDonald House, among others. In 2024 alone, we aired over 13,000 PSAs for local non-profit organizations. As broadcasters, we have a unique opportunity to support our communities in a profoundly impactful and meaningful way. In 2012, we launched a new local news franchise called "Heart of the High Plains." This weekly franchise highlights a local non-profit, promoting the non-profit's mission or fundraising event to provide an additional element that will help them reach their goal and achieve success.

KAMR Local 4 has been a cornerstone of the Amarillo community for over 70 years. We take great pride in our role as a trusted source of news, information, and emergency updates. Our station is committed to keeping our community informed and engaged, broadcasting live seven days a week. With 21 hours of live news and community programming per week, we provide unparalleled local coverage, including breaking news, severe weather updates, and in-depth reporting on local events, including our city's pollical landscape utilizing our, "Your local election HQ" brand messaging that has proven to be well known and respected in the Amarillo DMA year after year.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency

information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KAMR Local 4 are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Brandy Sanchez

Vice President & General Manager – KAMR Local 4

Dear Chairman Carr,

On behalf of KARK TV & KARZ, I'm writing in response to the initiative*: Delete, Delete, Delete* to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hurting the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and deeply competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community, ie….. Google, Facebook, and YouTube.

Here at KARK & KARZ we are deeply involved in the local communities we serve in Central Arkansas, and across the entire state of Arkansas.

Each week we produce 70+ hours of local news and community minded content through daily newscasts, Lifestyle programming – Arkansas Style, feature High School and Razorback Sports, along with critical safety/weather content via the Arkansas Storm Team. Our newsroom and state Capitol bureau is staffed around the clock to cover the important news of the day, legislative issues, community events, and the breaking news that informs and educates the more than a million people in our media footprint.

KARK provides a comprehensive connection to inform and protect Arkansans across the state during severe weather, including hours of live coverage during the March 31, 2023, tornado that touched down in the very center of Little Rock. Our team saved lives …….. as pointed out by the Governor, Sarah Huckabee Sanders. We were able to do our part in the recovery process as we partnered with the Arkansas Foodbank and City Center to provide food and supplies with a 10-day telethon manned by our staff.

Our station is here to honor, support, and celebrate the people and events that make Central Arkansas special. Some examples include the Day of Caring, where we align with community non-profit partners to assist their cause. Multiple Foodbank Telethon's are held throughout the year to raise awareness on our food deserts.

1401 West Capitol Avenue • Suite 104 • Little Rock, AR 72201-2940 • Phone: 501.340.444 • Fax:501.376.1852

The annual Women's Expo which highlights Healthcare, Financial, Service and Retail organizations oriented to women in our region. Victory over Violence, our market-wide messaging of encouragement to overcome our surroundings and defeat the factors that lead to under privileged circumstances.

Additionally, we demonstrate KARK's 70+ year commitment to our state and its viewers with Thursday Night High School Football in the Fall, celebration of Black History Month each February, and Hispanic Heritage in September. As a key stakeholder in the State Capitol, we deliver weekly statewide political content shows, Capitol View and Arkansas Business, numerous legislative specials, Town Halls, candidate forums and debates. Our audiences rely on us for the latest University of Arkansas sports via PigTrail Nation and its daily content. We will once again present the Miss Arkansas Pageant live from Little Rock across our statewide broadcast partners, with 50+ hours in additional contest coverage to let viewers experience this annual event across our platforms.

As our local newspaper, Arkansas Democrat Gazette has dropped numerous print editions, and tries to survive with electronic only service, the role local broadcasters play in disseminating accurate information is more vital than ever. Still, local stations like KARK are suffering because of archaic FCC rules and regulations that have no connection to the current fast changing marketplace we work in. In short, without regulatory relief, local television stations will be unable to continue making the kinds of local investments in our communities necessary to produce the high-quality news, weather and entertainment programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KARK-TV are at a distinct disadvantage. The constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Kyle King

Kyle King

Vice President & General Manager

1401 West Capitol Avenue • Suite 104 • Little Rock, AR 72201-2940 • Phone: 501.340.444 • Fax:501.376.1852

Dear Chairman Carr,

I started as a local broadcast sales account executive in 1993. Our main competitors were other television stations and the newspaper. The "newspaper" is a mere shadow of what it once was. I remember when local newspapers commanded about half of the advertising dollars in a market, had a full staff of journalists and was a driving social and political force in local communities. Television stations provided "the news" every morning and night. Some individual newscasts delivered 15-20% of the total market. Today if a newscast delivers 2-3% it is deemed strong and newspapers are teetering on the point of irrelevancy.

A lot has changed in the past 32 years for the local media industry, except the antiquated regulations of the FCC. Google has emerged as one of our main competitors for local advertising investments. With nearly no regulation their reach is global and has little to ZERO local investment creating the ability through scale to reach local business' target audience creating an unfair competitive advantage.

I applaud your efforts to gather comments through *Delete, Delete, Delete*. Over the past several years, I have personally met with members of Congress on both sides of the political spectrum. With the exception of Congressman Jim Clyburn, ALL others have agreed the FCC rules regulating ownership restrictions are detrimental to the industry and local journalism.

The elimination of ownership caps will protect local journalism, local investment, local jobs, protect communities, particularly in times of emergencies, and further innovative use of the broadcast spectrum. Nexstar Media Group is a real-world example of how scale is a benefit to local communities. Being the largest broadcasting group in the country, Nexstar has been additive to its service to local communities through investment in programming and people. Smaller groups have been and will continue to reduce services. The industry has hit a tipping point, and the FCC would be wise to move quickly. Many stations are already canceling newscasts and cutting journalists. These struggling small broadcast companies will likely be purchased by larger companies if the caps are eliminated and then expand services and hire more people. Waiting will only cause the struggling stations to lose viewing habits from canceled programming.

I am the Vice President and General Manager of KDAF CW33. KDAF is a Dallas-Fort Worth television station affiliated with The CW Network, broadcasting on channel 33. Owned by Nexstar Media Group, it offers The CW network programming, syndicated shows, and locally produced content. KDAF is the new broadcast home of the Texas Rangers, is the only local television station to produce and air a full local high school football game of the week, and localizes The CW Networks slate of sports programming including the NASCAR Xfinity Series . Originally launched in 1980, KDAF has undergone multiple network changes, previously affiliating with Fox and The WB. Today, it features popular shows like *All American* and *The Flash*, along with lifestyle segments such as *Inside DFW with Jenny Anchondo*. With strong community engagement, KDAF remains a prominent entertainment and news source in North Texas.

Eliminating ownership caps is the most common-sense FCC regulatory change. The benefits far exceed the costs, as the costs of not making the changes is a step towards the end of any kind of accredited local journalism.

Your request for these comments is appreciated.

Sincerely,

Marc Hefner
Vice President and General Manager

FOX 31 DENVER
COLORADO'S CW 2
100 E. Speer Blvd. Denver, CO 80203
303 - 595 - 3131
kdvr.com | kwgn.com

Dear Chairman Carr,

On behalf of KDVR FOX31 and KWGN CW2, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

The commitment to our local community has been in place for decades. In fact, KWGN-TV was Colorado's first TV station to sign on and the first to commit to local programming. To this day, KWGN CW2 provides seven (7) original hours of local news & lifestyle programming each weekday (41 hours per week). The station airs Colorado's only statewide issues program, *Colorado Point of View*. The weekly, half hour program dedicated to critical issues for Colorado voters airs in Denver, Durango, Colorado Springs, and Grand Junction. KDVR FOX31 is the market leader in providing in depth and continuous local news programming. With twelve (12) hours of local news each weekday (69 hours per week), FOX31 provides Colorado viewers the latest information about their communities along the front range. KDVR FOX31and KWGN CW2 continue to invest in resources and technology to provide the latest lifesaving weather information. Our ability to alert viewers and illustrate the danger ahead, is critical in protecting our viewers and assisting government agencies in protecting its citizens.

Our commitment goes beyond providing local news. Our local broadcaster mission involves being a partner with our communities. Over the years, KDVR and KWGN have collected tens of thousands of warm jackets for families, and thousands of toys for the holiday. The stations have raised hundreds of thousands of dollars to organizations like the Red Cross and Salvation Army. When our community is in need, local broadcasters like KDVR/KWGN respond.

Even though audience data continues to validate that local TV news is most watched and most trusted in their communities, local broadcasters are still under attack. Local stations like KDVR/KWGN are suffering because of outdated FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

100 E. Speer Blvd. Denver, CO 80203
303-595-3131
kdvr.com | kwgn.com

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist and the few large platforms were the legacy Big 3 broadcast networks. Those days are over. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KDVR/KWGN are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

I appreciate and thank you for your attention to this important matter.

Sincerely,

Byron Grandy
Vice President & General Manager
KDVR FOX31/KWGN CW2
Denver, Colorado

Mari Ossenfort
KELOLAND Media Group
501 S. Phillips Ave.
Sioux Falls, SD 57104

April 4, 2025

Chairman Brendan Carr
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Subject: Delete, Delete, Delete proceeding

Greetings Chairman Carr,

On behalf of KELOLAND Media Group, I am writing to express our stance regarding the Delete, Delete, Delete proceeding and to urge the Federal Communications Commission (FCC) to repeal current regulations that impose limitations on broadcast companies. These rules include: (1) setting a cap on the percentage of television households a broadcast company can reach, and (2) restricting the number of stations a broadcast company can own within a single local market.

The rapidly evolving media landscape is making it increasingly challenging for local broadcasters to compete with major digital platforms that lack the same level of regulatory oversight. Our TV station, KELOLAND Media Group, has been serving all of South Dakota and small portions of Minnesota, Iowa, Nebraska, Montana, and Wyoming for over 70 years, acting as a reliable source of news, information, and emergency updates for our viewers. We pride ourselves on delivering comprehensive local coverage, broadcasting live programming seven days a week, with a minimum of 40 hours per week dedicated to news and community events in addition to being active community servants.

Our commitment to the community extends beyond broadcasting, as we actively engage with and support our community through various actions such as volunteer work at local non-profits, blood drives, school tours, moderate events, pet food drives, 1,000's of public service announcements and event sponsorships aimed at fundraising for organizations in need. Last month we served meals to the homeless at The Banquet, next month we will host a blood drive and in June all our employees will be given 4 hours of paid time off to volunteer with a non-profit organization or public service agency in KELOLAND. These acts of kindness are all in addition to the news stories, finances, and airtime we donate.

Now more than ever, maintaining free, over-the-air broadcast television is crucial, especially for underserved communities that rely on us for essential information. As local newspapers and radio stations face closures or cutbacks, the role of local broadcasters like KELOLAND becomes even more vital in ensuring access to trustworthy information, critical news and emergency updates. Did you know in 2001 the primary newspaper in our region, The Argus Leader, had over 100 newsroom employees and now they are down to 5 local reporters that all work from home as they have sold their 95,000 square foot building. As a result, their Sunday subscriptions have gone from 75,000 to less than 5,000 in twenty-five short years. That is a 95% reduction in workforce and a 93% reduction in subscriptions. Without regulatory relief, we to will struggle to sustain high-quality journalism and the programming our viewer's request.

The existing FCC ownership restrictions, were well-intentioned in the past, now impede our ability to compete effectively in today's media landscape. Big Tech companies with unrestricted reach have significantly altered the media landscape, leaving local broadcasters at a disadvantage. They now dominate the advertising and media distribution sector, leaving local broadcasters like KELOLAND at a distinct disadvantage.

I respectfully request these outdated regulations be reevaluated and modernized to:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in technology, innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

We appeal to the FCC to promptly address these ownership restrictions, creating a level playing field that benefits both local broadcasters, our viewers and the communities we serve.

Thank you for your attention and consideration of this important issue.

Sincerely,

Mari Ossenfort
KELOLAND Media Group
Vice President and General Manager

KETK.com

Dear Chairman Carr,

On behalf of KETK-TV (NBC-Tyler, TX), I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of all local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KETK produces 35+ hours of local programming each week. Not just Local News but Community Affairs programming like our *In Focus* program (that focuses on one issue each week, like the need for rural broadband service), and *East Texas Live* which is a lifestyle show two hours M-F of all the great things happening here in East Texas. We produce and air the *East Texas Rose Parade* and many other local events as well. We have always had a strong commitment to Community Service at KETK. Many of us not only serve on the boards of local charities but the station spends a large amount of airtime helping these local agencies and our communities. Our local news plays a significant role in alerting and covering major local events like tornadoes, flooding and other lifesaving coverage. We work hard to serve our local communities, support local business and help those who need it most. Our ties to our community are deep and are the corner stone of our mission to serve East Texas.

As you can see our local newspapers and radio stations have either had to dramatically decrease their coverage of local issues or go out of business altogether. Often this results in a national footprint of content that does NOT serve our local communities. The archaic FCC rules and regulations that have no connection to current marketplace realities are constantly hurting our ability to serve our local market. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions had (in some ways) a place when they were first conceived, a media landscape that now does not exist anymore. The need to promote competition and diversity in the media is no longer needed due to the new streaming technology we now have in every market. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KETK are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

There is a time that all regulations need to be updated as the landscape of any industry changes. The reality is that the lack of attention to this issue over time has led to the unrestricted growth of Big Tech and while we have been squeezed to the point where my options as a General Manger are only to consider cutting staff and resources to stay economically viable. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Ward L Huey
Vice President & General Manager
KETK-TV, KTPN
4300 Richmond Rd
Tyler, TX 75703
whuey@KETK.com
903-279-0800

OKLAHOMA'S NEWS 4
KFOR.COM
444 EAST BRITTON ROAD
OKLAHOMA CITY, OK 73114
405-424-4444

April 3, 2025

Dear Chairman Carr,

I hope you are enjoying your new role at the FCC. As the Vice President and General Manager of KFOR-TV and KAUT-TV in Oklahoma City, I appreciate your mission to implement and enforce the laws and regulations that govern this great country's communication platforms. While embarking on your critical task, please give special attention to the *In re: Delete, Delete, Delete* proceeding which urges the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Television viewers in communities across the United States depend on their local TV stations to provide them with vital information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

KFOR-TV has spent 75 years being a beacon of information and community involvement in the state of Oklahoma. Currently, we produce more than 62 hours of local news every week, more than any other television station in the state. Included in those hours of local news, weather, and sports we produce and broadcast the longest-running political affairs program in Oklahoma. For decades, our viewers have relied on KFOR-TV to provide a place where our elected leaders can speak directly to their constituents in a *long-form* format, unburdened by the constraints of a 15 second soundbite.

Additionally, KFOR-TV has been locally, regionally, and nationally recognized for the life-saving weather coverage we've delivered to our viewers. At times, Oklahoma has been ravaged by some of the most violent storms on earth and KFOR-TV has been there LIVE before, during and after each natural disaster. Every time EF-5 tornadoes dramatically altered the communities we serve; KFOR-TV's work has been recognized as crucial to the safety and recovery of those in the path of the storm. KFOR-TV's coverage of the wildfires, flooding, and ice storms, which are so prevalent in this part of the country, has also been honored with the title "excellence in broadcasting." Quite simply, we are here to serve the people of Oklahoma, and we do it very well.

I think it is also important to note KFOR-TV has a long history of community service and engagement. Within the past year alone, our legacy television station – the first in Oklahoma – participated in or provided coverage to events like the Oklahoma City Heart and Stroke Walk, numerous blood drives, efforts to gather fans for needy citizens during the heat of the summer and coat drives during the frigid temperatures in winter. We also covered numerous community parades and holiday events throughout our viewing area. Perhaps most importantly, our staff spread out across our community last summer to volunteer at multiple charitable organizations. The Salvation Army of Central Oklahoma, The Boys & Girls Club, The City Rescue Mission, and Feed the Children all benefited from the work KFOR-TV employees willingly performed for them, so they – in turn – could better serve those in need.

As broadcasters in Oklahoma, we also work closely with the Oklahoma City National Memorial and Museum. Our television station is located just minutes from the site of the domestic terror attack that killed 168 people on April 19th, 1995. KFOR-TV's reporting, over the decades, has helped raise money and awareness for the OKC Memorial and Museum. Additionally, our work has helped the Memorial carry on the mission to honor those who were killed, those who survived and those who were changed forever by the Oklahoma City bombing. We are committed to the shared goal of educating Oklahoma's youngest citizens, as well as future generations, about the danger of hateful rhetoric and anger toward others.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. For example, Oklahoma's predominant statewide newspaper has seen a dramatic reduction in its staff and circulation during the past 5 years. The citizens of our state now depend on local television stations, like KFOR-TV, to pick up the much-needed function of "watchdog," providing investigative reporting and daily consumer advocacy on a local level. At the same time, local stations like KFOR-TV and KAUT-TV are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KFOR-TV and KAUT-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this very important matter.

Sincerely,

Wes Milbourn
Vice President and General Manager
Nexstar Media Inc.
KFOR-TV / KAUT-TV
Oklahoma's News 4 / CW43
444 East Britton Road
Oklahoma City, Oklahoma 73114
405.478.6260 Direct
405.641.9002 Cell
wes.milbourn@kfor.com

Dear Chairman Carr,

On behalf of KGET, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KGET we are deeply involved in the local community, my hometown. KGET and OGET, the only local Spanish newscast in Kern County, broadcast over 50 hours of live local news each week, the only media outlet to exclusively broadcast local debates, each year supporting over 125 local non-profits through public service announcements and fundraisers and our very own Compassion Corner holds a minimum of 17 drives each year fundraising over $250,000 for local nonprofits.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As The Bakersfield California continues to diminish and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality

Nexstar MEDIA GROUP, INC.
2120 L Street, Bakersfield, CA 93301

news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KGET are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.
Thank you for your attention to this important matter.
Sincerely,

Derek Jeffery
Vice President and General Manager

Nexstar MEDIA GROUP, INC.
2120 L Street, Bakersfield, CA 93301

April 4, 2025

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairman Carr,

On behalf of **KHON2 (FOX), KHII (MyNetworkTV), and Hawaii's CW**, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that place a cap on the percentage of the country's television households that a broadcast company may reach; and limit the number of stations a broadcast company may own in any single local market.

As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms—platforms that have no meaningful connection to the local communities we serve.

Here at **KHON, KHII, and Hawaii's CW**, we are deeply committed to the people of Hawaii. Together, our stations provide more than **55 hours of live, locally produced news and lifestyle programming** each week. From breaking news and severe weather coverage to highlighting local culture and community events, we strive to produce and air programs and content which reflect the interest, culture, and needs of the people we serve. Our team also supports a range of public service and charitable initiatives, including the annual Laulima Holiday drive, Make a Wish Drive, Red Cross Malama Maui Recovery Drive, and educational partnerships with Hawaii's schools and nonprofit organizations.

Television viewers across the country depend on their local stations for vital information that directly affects their lives—including news, sports, and emergency alerts. That role is especially critical in geographically unique and disaster-prone areas like Hawaii, where real-time communication can mean the difference between safety and danger.

Whether it's devastating wildfires on Maui, hurricanes threatening our islands, tsunami warnings triggered by earthquakes around the globe, or flash floods and other severe weather events, Hawaii is uniquely vulnerable to a wide range of natural disasters. Throughout all of these emergencies, **KHON has been a trusted lifeline for our community**—providing the critical information people need to stay safe, stay connected with loved ones, and be prepared when every second counts.

As local newspapers and radio stations scale back or disappear entirely, local broadcasters are increasingly the only remaining source of trusted, accountable journalism. Yet, stations like ours are limited by legacy FCC rules that have no basis in today's competitive environment. Without regulatory relief, broadcasters will struggle to maintain the resources needed to provide the high-quality local content our communities rely on.

The ownership restrictions in place were developed in an era when viewers had few choices and streaming platforms didn't exist. But those days are gone. Today, platforms like YouTube, Netflix, TikTok, and Facebook command massive audiences and advertising dollars—without the public service obligations or regulatory limitations faced by local broadcasters.

Stations like **KHON, KHII, and Hawaii's CW** are committed to serving our local communities, but we need the same flexibility and opportunity to grow that Big Tech enjoys.

Modernizing or removing the broadcast ownership rules would:

- Allow local broadcasters to invest further in technology, staff, and high-quality journalism.
- Help ensure long-term operational stability so we can continue innovating for our viewers.
- Provide a more level playing field to compete with digital media giants that face no such limits.

The media environment has changed, and the rules must change with it. We respectfully urge the FCC to eliminate these outdated ownership restrictions so that local broadcasters can thrive—and continue to serve their communities for generations to come. Thank you for your attention to this important matter.

Sincerely,

Kristina Lockwood

Kristina Lockwood
Vice President & General Manager
KHON2, KHII, Hawaii's CW

KLAS TV Las Vegas

Dear Chairman Carr,

On behalf of 8 News Now KLAS-TV, I'm writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters like Nexstar to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to Las Vegas or Southern Nevada.

We are proud that KLAS is the first Las Vegas television station in Las Vegas, launched in 1953. We now provide an average of 45 hours a week of locally produced news, sports, lifestyle and political programming for our Southern Nevada viewers. Our 8 News Now team of reporters, investigators, anchors, videographers and producers deliver critical information every day. In just the last few years we have produced Mayoral, Congressional and Gubernatorial debates, including the only debate in the critical 2024 U.S. Senate campaign here in Nevada, which was broadcast nationally by our parent company's cable news outlet, News Nation. We consistently provide comprehensive coverage of primary and general elections, produce a weekly political show, and produce specials reflecting the diversity of Las Vegas (Remarkable Women, Black History Month, Pacific-Islander/Asian American Month, Hispanic Heritage Month). In addition, we have produced specials dealing with critical Las Vegas issues, including education, crime, road deaths, the fentanyl crisis, valley growth, and future water supply allocation.

We are especially proud of our outstanding investigative reporting team, 8 News Now Investigators. Some of our recent efforts have included a series of stories on Nevada's DUI laws, which the legislature in the process of changing right now; stories about how there aren't laws in place to tackle negligent landlords also leading to a bill in the legislature; exclusive reporting on government programs investigating UAPs that are now in front of congress; stories last year on how a school board trustee moved out of state and was only attending meetings remotely, causing a police investigation, and her eventual resignation from the board; and story on a child who was shot by a neighbor and needed a wheelchair-accessible van, which caused people in the community to raise money for her and donate a van.

Our dedicated team also provides life-saving information during heat waves that reach 120 degrees, offering resources available to those without air conditioning, especially older residents living in older homes. We also offer life-saving information warning about flash floods during the annual monsoon season, including a recent flash storm that caused extensive damage to homes and property along Mt. Charleston.

KLAS TV Las Vegas

At KLAS we believe that serving our community is job one. We have annually collected over $20,000 of pet food and supplies for local animal non-profits with our "GR8 Pet Food and Supply Drive," benefitting Noah's Animal House and Retriever Rescue. Each July we collect and distribute thousands of school supplies with our "GR8 School Supply Drive" benefitting children at the Boys and Girls Clubs of Southern Nevada. Each November our "GR8 Food Drive" helps collect over $30,000 worth of food for local veterans at Share Village. We culminate every year by partnering with the U.S. Marines Toys for Tots project for our "GR8 Toy Drive" campaign, which collects over $25,000 of toys to brighten the holiday for thousands of needy children in the Las Vegas Valley. We are also here to honor and celebrate the people and events that make our area special. Examples include our broadcasts of the Vegas Strong Race in October and our participation in The Summerlin Patriotic Parade on July 4th. KLAS has also helped raise thousands of dollars for the Red Cross with our live telethons after major disasters. In support of the thousands of Las Vegas residents from the Hawaiian Islands and their family members, in 2023 we raised over $100,000 in support of the Maui Wildfire Victims. In January, our hosted telethon to benefit the California Wildfire Victims raised over $138,000.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations like KLAS are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KLAS are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

KLAS TV Las Vegas

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Jay Howell
Vice President & General Manager
KLAS-TV Las Vegas, NV

Dear Chairman Carr,

On behalf of KLST, I am writing regarding the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) cap the percentage of the country's television households that a broadcast company may reach, and (2) limit the number of stations a broadcast company can own in a single local market. As the media landscape continues to evolve, these outdated regulations hinder local broadcasters' ability to compete against "Big Tech" in an increasingly digital and competitive marketplace dominated by a few giant platforms with little to no meaningful connection to local communities.

KLST stands as the oldest TV station in San Angelo, embodying a rich history and tradition. Since 1953, viewers in the Concho Valley have depended on KLST for essential information, including news, weather updates, sports reports, and emergency alerts. In February 2021, our community experienced a major power outage during three unprecedented winter storms, which triggered the worst energy infrastructure failure in the state's history, resulting in critical shortages of water, food, and heat. Eighty percent of homes in our area were plunged into darkness. In this moment of crisis, the KLST news team and staff sprang into action, tirelessly collaborating with city officials and non-profits to coordinate relief efforts from our studios. This commitment to our community is at the core of who we are. We take immense pride in delivering timely and accurate information to our viewers—a responsibility that drives us to rise to the occasion every day.

Every week, KLST proudly delivers 21 hours of impactful and locally focused news content, keeping our community informed and engaged. In addition to comprehensive weather updates, in-depth news coverage, exciting parade broadcasts, enlightening town halls, and compelling documentaries, we actively champion a variety of community initiatives dedicated to helping those in need. Each year, our programs include:

- Children's Miracle Network Telethon, which raised $650,000 in 2024 for families in need.
- San Angelo Gives, which raised 4.2 million, benefiting 120 local non-profits and the community.
- School Supply Drive, a school supply drive for children in need.
- Coats for Kids, a coat and jacket collection drive.
- KLST Kid's First Toy Drive, providing gifts during the holiday season.

Through these initiatives, we aim to provide essential resources to the most vulnerable members of our community.

As local newspapers and radio stations close or are forced to limit their operations or switch to a national format, the role of local broadcasters in providing accurate information becomes increasingly important. However, local stations continue to face challenges due to outdated FCC rules and regulations that do not reflect the current marketplace realities. Without immediate regulatory relief, local television stations will struggle to invest in the high-quality news and information programming that our viewers rely on every day.

2800 ARMSTRONG STREET SAN ANGELO, TX 76903 OFFICE (325) 949-8800 FAX (325) 486-2089

The current ownership restrictions were initially designed to promote competition and diversity in broadcasting. They were created at a time when streaming technology didn't exist, and the media landscape was dominated by the few large platforms of the Big Three broadcast networks. However, those days are long gone. Today, streaming platforms, digital content providers, and Big Tech companies dominate the advertising and media distribution sectors, leaving local broadcasters, such as KLST, at a significant disadvantage. The limitations imposed by the broadcast ownership cap become even more apparent when compared to the unlimited reach of Big Tech across multiple devices in every American household. To remain viable and continue delivering high-quality local news, emergency information, and community programming, local broadcasters require the flexibility to grow without the current restrictions, just as their Big Tech counterparts do.

Updating these regulations is necessary for several reasons:

1. It will enable local broadcasters to enhance their news and community programming while continuing to invest in advanced technology and viewer services.
2. This change will allow local broadcasters to effectively compete with digital giants that currently face no restrictions on their reach.
3. Furthermore, it will enhance operational efficiency, ensuring financial stability and facilitating more effective long-term planning.

The current media landscape necessitates a reassessment of outdated rules that no longer adequately address the pressing challenges posed by increased industry competition. We urge the FCC to act quickly and decisively to remove restrictions on media ownership, creating a fair environment that benefits both local broadcasters and the communities they serve.

Thank you for your attention to this critical matter.

Sincerely,

Albert Gutierrez

Albert Gutierrez
KLST Vice President & General Manager

2800 ARMSTRONG STREET SAN ANGELO, TX 76903 OFFICE (325) 949-8800 FAX (325) 486-2089

Dear Chairman Carr,

On behalf of KNWA/KFTA/KXNW, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of all local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KNWA/KFTA/KXNW produces over 35.5 hours of local programming each week. Not just Local News but Community Affairs programming Good Day NWA (that focuses on nonprofit organizations) which airs one hour per day M-F. Also, we are very instrumental in helping raise money and awareness to several nonprofits such as the Cancer Challenge, American Diabetes Association, American Heart Association, Arkansas Children's Hospital, March of Dimes, NWA Food Bank, United Way and Single Parent Scholarship programs. We have always had a strong commitment to Community Service at KNWA/KFTA/KXNW. Many of us not only serve on the boards of local charities, but the station dedicates a significant amount of airtime to supporting these local agencies and our communities. Our local news plays a significant role in alerting and covering major local events like tornadoes, flooding, and other lifesaving coverage. We work hard to serve our local communities, support local businesses, and help those who need it most. Our ties to our community are deep and are the cornerstone of our mission to serve Northwest Arkansas and the River Valley.

As you can see, our local newspapers and radio stations have either had to dramatically decrease their coverage of local issues or go out of business altogether. Often this results in a national footprint of content that does NOT serve our local communities. The archaic FCC rules and regulations that have no connection to current marketplace realities are constantly hurting our ability to serve our local market. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

609 WEST DICKSON STREET, STE 300, FAYETTEVILLE, AR 72701 • PHONE 479-571-5100 • FAX 479-571-8914

The current ownership restrictions had (in some ways) a place when they were first conceived, a media landscape that now does not exist anymore. The need to promote competition and diversity in the media is no longer needed due to the new streaming technology we now have in every market. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KNWA/KFTA/KXNW are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

There is a time that all regulations need to be updated as the landscape of any industry changes. The reality is that the lack of attention to this issue over time has led to the unrestricted growth of Big Tech while we have been squeezed to the point where my options as a General Manager are only to consider cutting staff and resources to stay economically viable. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Lisa Kelsey

Lisa Kelsey
Vice President/General Manager
Nexstar Media Inc.
KNWA/FOX24/KXNW
609 West Dickson Street, 3rd Floor
Fayetteville, AR 72701
479-571-5100 Office
479-601-1834 Cell
lkelsey@knwa.com

April 4, 2025

Mr. Brendan Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairman Carr:

On behalf of KOIN-TV and KRCW-TV in Portland, Oregon, I write as part of the In re: "Delete, Delete, Delete" proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KOIN-TV has been and remains a pillar of the Portland-Salem-Vancouver, DMA, in Oregon and SW Washington for over 75 years. We are a trusted source of local news and information in our community and lead the market in public-service campaigns, town halls, political debates, community affairs programming, emergency updates, and severe weather coverage. Our station is committed to keeping our community informed and engaged, broadcasting live seven days a week. With over 53.5 hours per week of live news and community programming – with more being planned as we speak -- we provide local coverage that keeps our community and residents safe and informed. As you well know, the states of Oregon and Washington deal with significant wildfires every summer and I can cite examples where our news department has saved lives with real-time evacuation notices of neighborhoods affected by an encroaching wildfire.

Beyond our newsroom, KOIN-TV and KRCW-TV are deeply involved in strengthening the fabric of our community by supporting dozens of local non-profits including the Boys and Girls Club of Portland; the largest foodbank in the area called Snowcap; a local environmental non-profit named Solve that works tirelessly to clean up trash, litter, and debris that are scattered throughout the entire state of Oregon including beaches and waterways; and Age+ a local non-profit that improves the lives of those 70+ in our community – just to name a few examples. Each quarter, we air thousands of public service announcements dedicated to supporting charitable organizations and community events. From covering severe weather to amplifying the voices of local leaders and organizations, KOIN and KRCW consistently make meaningful advancements and investments in the well-being of our viewers. Maintaining free, over-the-air broadcast television to as many households as possible has never been more important, particularly for those in underserved areas who rely on us for critical information.

Television viewers across the Portland-Salem-Vancouver DMA, and the surrounding communities, depend on KOIN and KRCW to deliver the local news, weather, and emergency information that directly impact their daily lives. As local newspapers and radio stations continue to shut down or scale back operations, the role of local broadcasters has become even more vital. For example, several newspapers throughout Oregon have shut down operations creating an information void in those communities that KOIN and KRCW work hard every day to fill with relevant news and safety information to keep those communities safe. As these traditional sources diminish, KOIN and KRCW have stepped up to fill the void, ensuring that critical local news and emergency information remain accessible to the community. Despite this, stations like KOIN and KRCW face significant challenges due to outdated FCC rules that limit our ability to compete fairly in today's rapidly evolving media landscape. Without regulatory relief, we will struggle to make the necessary investments to sustain the high-quality journalism and programming our viewers need and desire.

The original ownership restrictions were put in place to promote competition and diversity in broadcasting at a time when streaming technology did not exist and the major broadcast networks dominated television. However, the industry has changed dramatically. Today, streaming platforms, digital content providers, and Big Tech giants wield vast influence, reaching households across multiple devices without any of the restrictions placed on local broadcasters. The reach limitations imposed on television stations place us at a severe disadvantage compared to these digital giants, who are not bound by the same regulations and continue to dominate the advertising and media distribution landscape.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

The reality of today's media environment demands a reconsideration of outdated rules that no longer reflect current marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tom Keeler
Vice President & General Manager
KOIN-TV and KRCW-TV – Portland-Salem-Vancouver DMA

Dear Chairman Carr,

On behalf of KREX-TV in Grand Junction, Colorado, I write to you as part of the *In re*: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

At KREX-TV we are deeply involved in the local communities we serve. Despite Grand Junction – Montrose being one of the nation's smallest television markets, the KREX staff produces 33 hours per week of local newscasts, which include severe weather and local sports coverage.

Television viewers in communities across the United States depend on their local TV stations to provide important information that directly impacts their lives, including news, weather, sports, and lifesaving emergency information. Local TV stations are often the primary place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KREX-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

· Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
· Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
· Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

William J. Dallman

Vice President & General Manager

4/3/2025

Dear Chairman Carr,

On behalf of KRON4, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KRON4 is news that Bay Area Residents Count On.

At KRON4, The Bay Area's Local News Station, our commitment to serving the community is not just a mission - it's a measurable impact. Through both our linear broadcasts and our digital platforms, we deliver timely, relevant, and essential information to the communities we serve.

- **Unmatched Local News Coverage**- We produce over 90 hours of live, local news each week between KRON4-TV and KRON4+, our free, highly rated OTT streaming app, more than any other Bay Area news outlet. Our dedication to around-the-clock reporting ensures our viewers stay informed and connected.
- **Critical Coverage During Emergencies**- In times of crisis, KRON4 is a lifeline for the Bay Area. Viewers consistently turn to KRON4 and KRON4+ for real-time, often lifesaving updates.
    - As just one example, KRON4 delivered continuous, street-level coverage with live updates, evacuation maps, and on-the-ground reporting during the Tubbs Fire in Santa Rosa. While damages exceeded $1.2 billion, our digital audience surged to nearly 10 million streams - a powerful indication of the trust our audience placed in us during critical moments.
- **Digital Leadership**- KRON4.com is the most visited television news website in the Bay Area. Whether on desktop or mobile, Bay Area residents rely on our digital platforms for the news they need—when and where they need it.
- **Statewide Political Leadership**- KRON4 plays a leading role in California's political journalism landscape. For multiple election cycles, we have produced and aired statewide political debates and town halls—broadcast across Nexstar stations in Los Angeles, Sacramento, San Diego, Fresno, and Bakersfield.
    - As an example, KRON4 hosted a live, statewide debate featuring U.S. Senate candidates Adam Schiff, Steve Garvey, Katie Porter, and Barbara Lee on February 12, 2024. The debate was broadcast live across California and streamed online to maximize accessibility for voters.
- **Inside California Politics-** KRON4 is also a key contributor to "Inside California Politics," a weekly political affairs program that airs across all six (6) Nexstar markets in California, reaching 92% of the state's population. The program offers timely updates on legislation and political developments, helping viewers understand how policy decisions impact their lives locally.

KRON4 remains committed to informing, empowering, and protecting our community—every day.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KRON4 are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Matthew A. Rosenfeld
Senior Vice President & Regional Manager

Dear Chairman Carr,

As the General Manager of KRQE-TV, I am writing as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) impose a cap on the percentage of U.S. television households a broadcast company may reach, and (2) limit the number of stations a broadcast company may own in any single local market. These outdated regulations hinder local broadcasters' ability to compete with "Big Tech" in an increasingly digital and highly competitive media landscape dominated by massive platforms with no direct connection to our local communities.

At KRQE, we are deeply committed to serving the people of Albuquerque and the surrounding communities of New Mexico.

Each week, KRQE produces over 60 hours of local news and community-focused content, ensuring that viewers stay informed on critical issues affecting their lives. Our newsroom operates 24/7, providing in-depth coverage of local government meetings, school board decisions, and public safety updates. Through our investigative journalism, we hold those in power accountable and keep our communities informed with accurate, timely reporting. Additionally, our weekly political program, "New Mexico Insiders," dives deeper into statewide political and policy issues, providing valuable insights to our audience.

KRQE is also a lifeline for viewers who rely on us for severe weather updates and emergency information. Whether covering wildfires, flash floods, or severe winter storms, we provide real-time updates and safety information to help protect lives and property. Our commitment extends beyond reporting—we actively collaborate with local organizations to support recovery efforts in affected communities, including fundraising efforts with the Red Cross and local relief agencies.

Beyond news and emergency coverage, KRQE actively contributes to the well-being of our community through several impactful initiatives. Our "KRQE Cares" program has provided tens of thousands of new shoes and school supplies to children in need, ensuring they have the tools necessary to succeed.

We take pride in honoring the rich culture and history of New Mexico by broadcasting and covering major local events, including the Albuquerque International Balloon Fiesta, the Gathering of Nations Pow Wow, and the annual New Mexico State Fair. Additionally, we produce live coverage of local traditions, including major parades, and our broadcasts celebrate Hispanic Heritage Month, Native American Heritage Month, Black History Month, and Women’s History Month, ensuring diverse voices and stories are heard across our airwaves.

We also provide an important civic service by hosting local political specials, candidate forums, and debates, ensuring New Mexicans have access to the information they need to make informed decisions. Our recent election coverage, including gubernatorial debates and local policy discussions, highlights our commitment to an informed electorate.

Despite our dedication to local journalism and community service, outdated FCC ownership restrictions threaten our ability to sustain and expand these efforts. As local newspapers and radio stations struggle to survive, local broadcasters like KRQE are increasingly the only source of trustworthy news and emergency information. However, we face significant competitive disadvantages compared to digital giants that operate without the same regulatory constraints.

The current ownership limits, originally designed to promote competition and diversity in broadcasting, were established in an era before streaming technology and digital platforms became dominant. Today, companies like Google, Facebook, and Netflix reach unlimited audiences and command a disproportionate share of advertising revenue, leaving local broadcasters at a disadvantage. Without regulatory relief, stations like KRQE will struggle to maintain the quality journalism and community programming upon which our viewers rely.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and invest in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your time and attention to this critical issue.

Sincerely,

Jeff Miller
Vice President / General Manager
Nexstar Media Inc.
KRQE-TV
13 Broadcast Plaza SW
Albuquerque, NM
(402) 738-0943 Cell
JefMiller@nexstar.tv

April 4, 2025

Dear Chairman Carr,

On behalf of KSNF-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KSNF we are deeply involved in the local communities we serve in Southwest Missouri, Southeast Kansas, and Northeast Oklahoma. I would like to highlight three initiatives that serve as examples of our community involvement and the benefits they provide.

Nexstar Media Group, Inc, made a significant investment to provide Doppler radar to KSNF's local market. Doppler radar provides real-time, high resolution weather data that helps our meteorologist track sever weather events with greater accuracy. This technology is especially vital for detecting rotation in storm systems, a key indicator of potential tornadoes. During the devastating May 2011 tornado that struck Joplin, the presence of local doppler radar proved to be immensely valuable. Although the storm evolved quickly, local doppler radar helped KSNF's meteorologists detect the intensifying storm and issue timely warnings. The localized radar capabilities allowed for more precise tracking of the tornadoes' path, helping emergency services and residents make informed decisions. In regions prone to severe weather, having a dedicated local Doppler radar system enhances forecasting accuracy and saves lives by providing earlier, more detailed warnings. A local Doppler radar in a market our size is truly a unique and valuable asset.

1502 Cleveland Joplin, MO 64801 (p)417-781-2345 (f)417-782-2417

Over the past decade, KSNF-TV has awarded more than $110,000 in Scholarships through our Golden Lion Award, directly supporting students' educational journeys at Missouri Southern State University. The Golden Lion Award holds significant value in recognizing and uplifting local high school seniors who have demonstrated exemplary service to their schools, communities, and fellow students. This award not only highlights the achievements and character of outstanding young leaders but also reinforces the importance of civic responsibility and community involvement. By investing in the future of local youth, the program strengthens the bond between education and community service, and regional growth, while encouraging students to continue making a positive impact in the communities.

KSNF's Anti-Violence Project is a vital, locally produced one-hour televised special that addresses pressing issues surrounding mental health, crime and violence in our region. As communities face a concerning rise in these challenges, the program serves as an important platform for raising awareness, promoting dialogue and spotlighting solutions. By featuring in-depth interviews with local experts, politicians, and law enforcement, the Anti-Violence Project offers a comprehensive look at the root causes of violence and the proactive measures being taken to combat it. Beyond broadcast, the initiative extends into the community through impactful town hall meetings held in Miami, Oklahoma and Joplin, Missouri-creating space for residents to voice concerns, ask questions and engage in the conversation. This multifaceted approach not only informs but empowers local communities to be part of the change needed to reverse these growing trends.

Television viewers in communities across the United States depend on their local TV stations to provide them with valuable information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KSNF-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

John Hoffmann
Vice President & General Manager
KSNF-TV Joplin, MO

April 4, 2025

Chairman Brendan Carr
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Dear Chairman Carr,

On behalf of KSNT (NBC) and KTMJ (FOX), I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KSNT and KTMJ are more than just businesses in northeast Kansas. We have been a member of and serving this community since 1967. Our local news commitment is a responsibility we take seriously. With over 36 hours of local news a week, we keep the community informed, educated and safe. Being in the state's capital, we also keep voters up to date on current political events and offer the only Kansas political show in the state.

Aside from news, KSNT and KTMJ has made an impact on charitable organizations like St. Jude Children's Research Hospital and the Ronald McDonald House Charities of Northeast Kansas, raising over $1.25 million in donations just in 2024. Through dedicated fundraising campaigns such as the St. Jude Dream Home Giveaway, KSNT and KTMJ has rallied community support to fund life-saving treatments for children battling serious illnesses. Additionally, the station has been instrumental in raising awareness and resources for the Ronald McDonald House, which provides lodging and support for families with hospitalized children. As manager of these stations, I also sit on two local boards: TARC and Project Topeka. TARC is a non-profit organization dedicated to improving the lives of children and adults with physical and mental disabilities in the seventeen counties we serve, and Project Topeka another non-profit organization, created to help feed children in our community. By leveraging its platform to promote these causes, KSNT and KTMJ reinforces its commitment to making a difference in the community. As local newspapers and radio stations continue to shut down or scale back operations, the role of local broadcasters has become even more vital. As these traditional sources diminish, we have stepped up to fill the void, ensuring that critical local news and emergency information remains accessible to the community. Despite this, stations like us face

KSNT-TV/KTMJ-TV
NEXSTAR BROADCASTING, INC.
6835 NW US HIGHWAY 24
TOPEKA, KANSAS 66618-5507

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significant challenges due to outdated FCC rules that limit our ability to compete fairly in today's rapidly evolving media landscape. Without regulatory relief, we will struggle to make the necessary investments to sustain the high-quality journalism and programming our viewers want and need.

The original ownership restrictions were put in place to promote competition and diversity in broadcasting at a time when streaming technology did not exist and the major broadcast networks dominated the media landscape. However, those days are long gone. With streaming platforms, digital content providers and "Big Tech" now dominating the advertising and media distribution sectors, local broadcasters like KSNT and KTMJ are at a distinct disadvantage. The constraints of the broadcast cap are stark when contrasted against the unlimited reach of "Big Tech" and to multiple devices in every household in America. In order to remain viable and continue providing local news, emergency information and community programming, local broadcasters need the flexibility to grow without restrictions.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

The reality of today's media environment demands a reconsideration of outdated rules that no longer reflect current marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Jim Baronet
Vice President & General Manager
KSNT, KTMJ

KSNT-TV/KTMJ-TV
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Dear Chairman Carr,

On behalf of KTAB, I am writing regarding the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) cap the percentage of the country's television households that a broadcast company may reach, and (2) limit the number of stations a broadcast company can own in a single local market. As the media landscape continues to evolve, these outdated regulations hinder local broadcasters' ability to compete against "Big Tech" in an increasingly digital and competitive marketplace dominated by a few giant platforms with little to no meaningful connection to local communities.

Since 1979, viewers in the Big Country have relied on KTAB for essential information, including news, weather updates, sports reports, and emergency alerts. KTAB serves as a primary source of information and is vital to local journalism. Like the spring of 2024, when a series of tornadoes struck our viewing area, causing significant property damage and endangering lives. Our weather team was on the front lines, and viewers turned to KTAB for the latest weather updates to stay informed and safe. We are committed to actively engaging with our local community. We strive to provide our viewers with timely and accurate information —a responsibility we take seriously.

Each week, KTAB delivers 22 hours of high-quality, locally focused news content. In addition to our weather and news coverage, we support a range of community initiatives that aim to assist those in need. Each year, our programs include:

- The West Texas Rehab Center Telethon, which raised $1.5 million in 2025 for families in need.

- Abilene Gives, which raised 2.1 million, benefiting 150 local non-profits and the community.

- Tools for Schools, a school supply drive for children in need.

- Jackets for Joy, a coat and jacket collection drive.

- Guns & Hoses Blood Drive, which supports our local blood bank.

- Santa's Helpers, providing gifts during the holiday season.

Through these initiatives, we aim to provide essential resources to the most vulnerable members of our community.

As local newspapers and radio stations close or are forced to limit their operations or switch to a national format, the role of local broadcasters in providing accurate information becomes increasingly important.

However, local stations continue to face challenges due to outdated FCC rules and regulations that do not reflect the current marketplace realities. Without immediate regulatory relief, local television stations will struggle to invest in the high-quality news and information programming that our viewers rely on every day.

The current ownership restrictions were initially designed to promote competition and diversity in broadcasting. They were created at a time when streaming technology didn't exist, and the media landscape was dominated by the few large platforms of the Big Three broadcast networks. However, those days are long gone. Today, streaming platforms, digital content providers, and Big Tech companies dominate the advertising and media distribution sectors, leaving local broadcasters, such as KTAB, at a significant disadvantage. The limitations imposed by the broadcast ownership cap become even more apparent when compared to the unlimited reach of Big Tech across multiple devices in every American household. To remain viable and continue delivering high-quality local news, emergency information, and community programming, local broadcasters require the flexibility to grow without the current restrictions, just as their Big Tech counterparts do.

Updating these regulations is necessary for several reasons:

1. It will enable local broadcasters to enhance their news and community programming while continuing to invest in advanced technology and viewer services.

2. This change will allow local broadcasters to effectively compete with digital giants that currently face no restrictions on their reach.

3. Furthermore, it will enhance operational efficiency, ensuring financial stability and facilitating more effective long-term planning.

The current media landscape necessitates a reassessment of outdated rules that no longer adequately address the pressing challenges posed by increased industry competition. We urge the FCC to act quickly and decisively to remove restrictions on media ownership, creating a fair environment that benefits both local broadcasters and the communities they serve.

Thank you for your attention to this critical matter.

Sincerely,

Albert Gutierrez

Albert Gutierrez

KTAB Vice President & General Manager

4510 S. 14TH STREET ABILENE, TX 79605 OFFICE (325)692-4242 FAX (325)692-2286

KTLA 5 5800 SUNSET BOULEVARD ▪ LOS ANGELES, CA 90028-6607 ▪ 323 460-5555

Dear Chairman Carr,

On behalf of KTLA in Los Angeles, I'm writing as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Television viewers in communities across the United States depend on their local TV stations to provide them with important, and sometimes life-saving information.

The recent Los Angeles wildfires proved the importance and critical role of KTLA to viewers in Southern California. Each week KTLA produces over 100 hours of local news and when the fires broke out KTLA reported continuously for over 75 hours. We were a non-stop, literal lifeline to our viewers. KTLA had our helicopter in the air, showing maps with the constantly changing evacuation routes clearly outlined. And when an erroneous evacuation alert was sent to millions of Californians, KTLA and stations across the state were inundated with viewers asking if the evacuation order was real. Television journalists were the first to calm residents' nerves and provide accurate information. A recent letter from a viewer said this, "*KTLA - got me though, saved me, taught me play-by-play, from fire evacuation routes, to hosing down a house, to insurance to breaking developments on how to survive." " As I sat alone with my scared dog in that hotel day after day, it was your team of pros and empathetic staff - that helped me get through the most excruciating time of our lives".*

Big Tech serves algorithms. We serve communities. In 2024 KTLA partnered with 78 community non-profits throughout greater Los Angeles. Our joint efforts helped raise over $28,000,000 of funding to provide services for the American Heart Association, the LA Fire Department, Project Angel Food, Homeboy Industries, Scouting America, and so many other worthwhile organizations providing essential services.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. In Los Angeles, the LA Times has reduced their journalistic staff by over 20% - and in many communities local TV stations are often the only remaining source of local news and information.

Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KTLA are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Janene Drafs

Vice President & General Manager

KTSM.COM KTSM DIGITAL ESTRELLA TV

Dear Chairman Carr,

On behalf of KTSM TV, I write as part of the proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KTSM TV we are deeply involved in the local community where we produce 31 and half hours of local news. We have covered most recently the border crises as it pertains to El Paso, Tx and Juarez, Mexico. We have interviewed men, women and children that were seeking asylum from other countries and what they had to pay and go through to get to the border. We interviewed cartel members and gang members as well as law authorities about the war on drugs. We had an extensive live coverage on the Walmart shooting and continue to be the exclusive station in the courtroom covering the trial of the mass murderer. We have live coverage of political debates covering both regional and local elections. We have had interviews with Senators, Congressmen/women both republican and democrat regarding issues and differences and looking for common ground. We just recently covered the worst dust storms in recent history limiting traffic and travel for days. KTSM was one the first station to cover UTEP National Basketball Champions of 1966 where the first all black starting lineup changed the course of sports history. Our Studio 9 lifestyle show provides viewers with what's new in El Paso and guidance on various topics like home and garden to recreation and fashion. KTSM has been a main stay in El Paso for over 72 years.

As a broadcaster, I am certain that one of the most important roles we play is to do good for those in need and to lend a helping hand. We do extensive partnering with the El Paso Food Bank. We have our annual clear the shelters campaign where we help find homes for the many pets. We have our annual "The More You Know Expo" where we have school districts compete for best weather science projects.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their

lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and increasingly the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KTSM are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

· Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.

· Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.

· Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

David Candelaria

Vice President & General Manager

3801-D Constitution | El Paso, TX 79922 | 915.532.5421

Dear Chairman Carr,

On behalf of KTVI/KPLR, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KTVI/KPLR we are deeply involved in the local community… we broadcast over 90 hours of news a week, and a community affairs show locally produced weekly called the PULSE.

I am a board member on four nonprofit organizations in St. Louis including the Urban League, Heat Up/Cool Down, and Better Community Living (underserved housing). In addition, we aired the only senate candidate debate over the last four years, including Hawley vs Kunce, on October 31, 2024. We also aired the first broadcast debate for the St. Louis Mayor (Jones vs Spencer) two times over the last five years.

We have also developed news' franchises to support our citizens, including "You Paid For It" and "Contact 2", both for consumer & citizen advocacy.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KTVI/KPLR are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Kurt D. Kruger

Vice President & General Manager

KTVX/KUCW • 2175 West 1700 South • Salt Lake City, Utah 84104 • 801-975-4444

Dear Chairman Carr,

On behalf of Utah's very first television station, KTVX, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few massive platforms that have no meaningful connection to our local community.

Here at KTVX, known as ABC 4 to our viewers, we are deeply involved in the local communities we serve. As Utah's very first television station, we take our role very seriously. For more than 77-years Utahn's have trusted us to be there we they need us most: in times of disaster, during severe weather and with unique and unduplicated local stories that make our communities stronger. Our local news team produce more than 39.5 hours of local news and information every week. It is a massive task as our coverage area is largest in the United States, covering the entire state of Utah, parts of Idaho, Wyoming and Nevada.

Television viewers in communities across the United States depend on their local TV stations to provide them with essential information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions were originally intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KTVX-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when

contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Mark D. Danielson

Mark Danielson
Vice President & General Manager
KTVX-TV, Salt Lake City, Utah

FOX 5 SAN DIEGO KUSI NEWS

Dear Chairman Carr,

On behalf of KSWB FOX 5 & KUSI, I write as part of the *In re: "Delete, Delete, Delete"* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters like us to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KSWB (FOX 5) & KUSI, we are deeply invested in the local community and that commitment is evident in everything we do. Having two distinct, independent TV stations, each with their own loyal audience, allows us to serve those with varied views across the San Diego area in a robust and meaningful way. Here are specific examples of how:

- 127 hours combined weekly of local news, delivering the most local news in San Diego.
- Deep, thorough professional and local sports coverage with over 1122 hours of live sports a year.
- Vital "micro-climate" weather coverage that serves our vast geographical area, keeping the audience safe no matter what part of San Diego they call home.
- Supporting local non-profits with live shots, emcees and promos to connect more personally with the people that make up our varied community.
- Exclusive Border Report coverage to bring relevant video and timely updates to this important San Diego issue.
- Creative, popular and heart-warming community programs like KUSI's Community Champions, FOX 5's 9/11 Stair Climb, Remarkable Women and many more.
- Significant military news coverage that connects us to our Navy, Marine and Coast Guard communities.
- Broadcast coverage of exclusive local previews of national programs like the 75th Anniversary of D-Day (with hundreds of local veterans) aboard the USS Midway.

In addition, for 15 years, FOX 5 has produced the annual 4th of July Fireworks show, BIG BAY BOOM, which, as the second largest 4th of July fireworks show in the country, raises funds for local military families through the Armed Services YMCA. This event is broadcast live on air and on our website, making it the #1 most viewed fireworks show in the city and top 5 in the entire country. Also, KUSI delivered the best-in-class High School Football coverage for over 26 years with the station's legendary "Prep Pigskin Report." All these endeavors are also fully supported on our combined FOX 5/KUSI website, FOX5SanDiego.com/KUSI.com.

Television viewers in communities across the United States depend on their local TV stations as they do here in San Diego to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations like FOX 5 & KUSI are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters just like FOX 5 & KUSI are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters like us to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

With the power of two brands, FOX 5 and KUSI is in the best position in the market to serve "America's Finest City" and the entire San Diego community with efficiency, accuracy and dedication. We are a media force in the market, in place to cover breaking news, wildfires, flash-flooding, road closures, beach / water /border issues like no one else can. But we can even do more!

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. I encourage the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

From San Diego, I thank you for your attention to this important matter.

Sincerely,

Scott Heath/Vice President & General Manager
FOX 5 San Diego/KUSI – 7191 Engineer Road, San Diego, CA 92111
858-496-0245

Dear Chairman Carr,

As the General Manager of KVEO-TV, I'm writing you as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KVEO we provide viewers with local news via CBS4, NBC23, and ValleyCentral.com, and as such we are deeply involved in the local communities we serve in the Rio Grande Valley of Texas. Every week, we produce over 50 hours of local news and community-centric content through our various local newscasts, our weekly political issues show *Inside Valley Politics,* and our local lifestyle show, *Valley por Vida*. Our newsroom is staffed 24/7 to cover the important, relevant local and regional stories that impact hundreds of thousands of people who depend on us to keep them informed. From important city council, school board, and other governmental meetings to local events and campaigns, KVEO-TV is a reliable and trustworthy part of the fabric that makes up the communities our employees call home.

We're also a lifeline for hundreds of thousands of our viewers who depend on KVEO-TV for severe weather and hurricane coverage along the Gulf Coast. And we're here before, during, and after the storms to prepare and warn our viewers, and to help them recover. The most recent examples of which included our wall-to-wall coverage of flooding in the Rio Grande Valley last week but also include massive coverage of multiple Tropical Storms that affected our region last year. And as always, *after the storm*, we partner with the Red Cross and other local agencies to raise tens of thousands of dollars to help those impacted by both storms.

We are also here to honor and celebrate the people and events that make our area special. Examples include our live broadcasts of the Charro Days Festival in February, and both the La Feria and Mercedes Livestock and Rodeo shows, as well as the largest nighttime parade in the country with the McAllen Christmas Parade. Additionally, we broadcast our news LIVE from Friday Night High School Football games from August to November. We produce news stories and local specials that celebrate Black History Month in February,

Women's History Month in March, and Hispanic Heritage Month in September and October.

We've also produced local political specials, candidate forums, and debates, including the only Texas Governors debate in the 2022 in Texas, which was broadcast nationally by our parent company's cable news outlet, News Nation.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism. As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KVEO-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America.

In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and invest in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to

ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Jeff Miller
CBS4 / NBC23 / Valleycentral.com
Vice President / General Manager
Nexstar Media Inc.
9201 W Expressway 83
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JefMiller@nexstar.tv

April 3, 2025

Dear Chairman Carr,

On behalf of KX News, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KX News has been deeply involved in our communities across western North Dakota for the past 72 years. We serve our local communities with great pride as a trusted source of news, information and emergency announcements. Every week, we produce over 35 hours of local news and community programming between our newsroom and bureaus with essential local, and regional coverage for those that depend on us to keep them informed. From important city council meetings, energy and agricultural conversations, local events, and the work being done right here in Bismarck, our capital city, KX News is a reliable and trustworthy part of the foundation that our communities rely on.

Our viewers depend On KX News for severe weather information. From snowstorms to deadly tornados our local coverage provides the warnings needed in preparation, even in the most rural areas of our region. The commitment continues after the storm as we help those affected to recover. Just this last fall we witnessed & reported on wildfires across western ND with a total of 126,273 acres that flared across our small towns and open land due to the drought and high winds. Our team was on the scene keeping our community informed through it all and after, bringing the community together to help those in need after the devasting losses of loved ones, homes and livestock, by partnering with local agencies to assist.

KX News is committed to our communities and the viewers we serve. We celebrate the people that make our communities special and are making a difference. From our Honor Flight veterans to those fighting human trafficking on our Indian reservations, to airing local parades and cold case victim's stories, we demonstrate the responsibility we take in sharing this local information every day to our viewers.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news,

weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KXMA/KXMB/KXMC/KXMD - KX News are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

/ Tammy Blumhagen

Vice President & General Manager

kxan

April 2, 2025

Chairman Brendan Carr
Federal Communications Commission
45L Street NE
Washington, DC 20554

RE: *Delete, Delete, Delete*

Dear Chairman Carr,

On behalf of our local team at KXAN-TV here in Austin, TX, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. The media landscape has radically changed over the past several decades; regulatory policy has not. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

At KXAN, the essence of what we do is to serve our community and we have been doing so for over 60 years. We are in the local storytelling business and are deeply connected and involved in the local community. We strive to keep our viewers informed and safe. Our *core purpose* created in 2010 states, "inform and enrich the community, and make people's lives better". This is our guiding light, our north star if you will. Our brand is "in-depth & investigative". We typically produce 30 investigative stories per month, often sourced from viewer tips which now average about 2,000 per month, all in an effort to make our community a better place to live. In the previous Texas legislative session, KXAN investigations were responsible for eight senate and house bills being signed into law by Governor Greg Abbott. We expect similar results in this year's legislative session.

As the dominant local media operation in town, we know we have a serious responsibility to keep people safe, especially during severe weather. Our meteorologists are always prepared to break into programming, send out text and digital alerts, and strive to be the best at warning central Texans of dangerous weather approaching and moving through the community.

We also serve the community local sports, producing and televising weekly live High School football games throughout the season. We recently produced and televised University of Texas Sand Beach Volleyball for the first time and it was a big hit! We are the media sponsor for the biggest community event of the year – the huge holiday event Trail of Lights. KXAN also partners with the American Heart Association's four big annual events, the Central Texas Food Bank, Family Elder Care Summer Fan Drive, and many others to promote important local community causes and events.

All this to say, we are 110% locally invested in the prosperity of our local community!

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often

lifesaving emergency information. Local TV stations are often the initial place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KXAN are at a distinct disadvantage under current regulatory policy. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

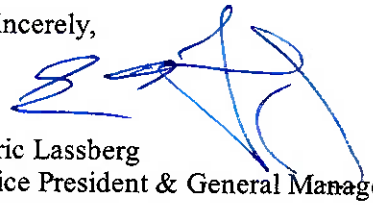
Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,



Eric Lassberg
Vice President & General Manager

908 West Martin Luther King Jr. Blvd.
Austin, Texas 78701

Dear Chairman Carr,

On behalf of KXRM-FOX21, I write in response to the "Delete, Delete, Delete" initiative and urge the Federal Communications Commission (FCC) to eliminate outdated regulations that (1) cap the percentage of television households a broadcaster may reach and (2) limit station ownership within a single local market. These restrictions hinder local broadcasters' ability to compete in an evolving media landscape dominated by digital giants with no meaningful connection to our communities.

As a vital voice for Southern Colorado, KXRM-FOX21 delivers 45 hours of locally produced news and lifestyle programming weekly, keeping our viewers informed on everything from severe weather to economic development. Our region, home to a significant military presence, diverse industries, and a thriving tourism economy, depends on timely, relevant reporting that only local broadcasters can provide. Additionally, we partner with local businesses, law enforcement, and advocacy groups to support issues such as economic growth and public safety, including efforts to combat human trafficking along major interstate corridors, namely I-25 that spans the entire Southern Colorado region.

Local broadcasting is more critical than ever as print and radio outlets scale back or shift to national content. However, the constraints of outdated FCC ownership rules place us at a stark disadvantage compared to Big Tech's extensive digital reach that operate without restrictions. Modernizing these regulations would:

- Enable local broadcasters like KXRM-FOX21 to expand and enhance local news and community programming.
- Allow us to compete with digital platforms that currently compete without similar reach constraints.
- Improve operational efficiency, ensuring financial stability and long-term investment in local journalism

The original ownership limits were designed for a media landscape that no longer exists. In today's environment, these restrictions undermine our ability to serve the public effectively. We urge the FCC to remove these barriers and level the playing field for local broadcasters.

Thank you for your attention to this important matter.

Sincerely,

Donna D'Amico
Vice President & General Manager
KXRM-FOX21 Colorado Springs, CO

WATE-TV - ON YOUR SIDE
1306 N BROADWAY - KNOXVILLE, TN 37917
A NEXSTAR MEDIA GROUP, INC. STATION

Dear Chairman Carr,

On behalf of WATE-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WATE-TV is proud to be known as East Tennessee's first television station. Our rich history supporting our community with important news and lifesaving weather information is second to none. Through more than 43 hours of live local news each week, to original programming showcasing the Tennessee River Valley, WATE-TV is known for telling the stories making a difference, Stories that matter to the people who live here. Our team of Meteorologists have been certified "Most Accurate" 8 years in a row, making sure we are all safe from dangerous weather. We are also committed to helping our local nonprofits achieve their goals through partnerships and coverage. Some of the wonderful organizations we work with include The United Way, Alzheimer's Association of Tennessee, Second Harvest Food Bank, Helping Mamas, Emory Valley Center and local Honor Guard Units. By partnering with a local business, we recently helped raise more than a million dollars for Hurricane Helene relief. This money is helping Samaritans Purse give hope to the people directly impacted. Community, compassion and commitment connect all of us here in East Tennessee, and we love making a positive impact in our region. We are here to inform, engage and help.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

- more -

WATE-TV - ON YOUR SIDE
1306 N BROADWAY - KNOXVILLE, TN 37917
A NEXSTAR MEDIA GROUP, INC. STATION

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WATE-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Kimberly Byrd
Vice President & General Manager

Carol L. Ward
Vice President/General Manager
300 Wavy Street
Portsmouth, VA 23704

April 4, 2025

Dear Chairman Carr,

On behalf of WAVY-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that:

1. Place a cap on the percentage of the country's television households that a broadcast company may reach
2. Limit the number of stations a broadcast company may own in any single local market.

These restrictions, conceived in a vastly different media era, now hinder local broadcasters' ability to compete with "Big Tech" in today's digital, highly competitive marketplace—one dominated by a few giant platforms with no meaningful ties to our local communities.

For nearly 70 years, WAVY-TV has been at the heart of Hampton Roads and NE North Carolina, delivering reliable news, weather, and critical information to our community. We are committed to keeping viewers informed with live broadcasts seven days a week, providing more than 63 hours of news and local programming each week. Whether it's breaking news, severe weather alerts, or in-depth investigative reports, we are dedicated to delivering the coverage that matters most to our community.

Our role extends beyond reporting. As "10 On Your Side", WAVY-TV is committed to making a lasting impact and actively uplifts and supports the communities we serve. Each quarter, we air thousands of public service announcements to support local charities, nonprofits, and events. Whether we're tracking hurricanes, highlighting local leaders, or championing important community initiatives, WAVY-TV is committed to serving and strengthening Hampton Roads and NE North Carolina. Ensuring access to free, over-the-air television remains a top priority—especially for underserved communities that rely on us for vital information.

Television remains the primary, and in many cases the only, source of local journalism for many residents. As newspapers and radio stations continue to decline, local broadcasters play an increasingly critical role in delivering accurate, timely information. Yet, despite this essential public service, outdated FCC rules restrict our ability to compete fairly and invest in the future of local broadcasting. Without regulatory relief, sustaining high-quality journalism and programming will become increasingly difficult.

The original ownership restrictions were put in place to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the Big 3 broadcast networks dominated television. However, the industry has changed. Today, streaming platforms, digital content providers, and Big Tech giants wield vast influence, reaching households across multiple devices without any of the restrictions placed on local broadcasters. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and

757-396-6142 carol.ward@wavy.com

Carol L. Ward
Vice President/General Manager
300 Wavy Street
Portsmouth, VA 23704

community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Modernizing or eliminating these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The current media landscape demands a regulatory framework that reflects modern realities, not outdated legacy rules. We urge the FCC to take decisive action to remove these restrictions, fostering a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your time and attention to this important matter.

Sincerely,

Carol L. Ward
VP/General Manager
WAVY-TV

757-396-6142 carol.ward@wavy.com

Dear Chairman Carr,

On behalf of 12 News WBOY-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here At 12 News WBOY-TV, we are deeply rooted in the communities we serve. Each week, we produce 29.5 hours of local news and lifestyle programming, covering the stories that matter most to our viewers. In addition, our Gold and Blue Nation team, as the official television partner of WVU Athletics, delivers approximately two hours of exclusive WVU sports content weekly—more than 70 hours annually—positioning our stations as the local leaders in Mountaineer sports coverage through our partnership with WVU Athletics.

Our commitment to keeping the public informed is especially evident during severe weather. From last year's tornado warnings in April to this year's severe storms just a few days ago, our weather team, including Chief Meteorologist Justin Kiefer and Meteorologist Erika Mrazik, delivered timely and critical coverage. We followed up extensively on the aftermath, especially in the hardest-hit areas served by our sister stations. We also provided in-depth coverage of the severe drought last summer into the fall, and during the snowstorms this January, our team produced comprehensive web content, including long-form explainer videos on Facebook Live. This is in addition to the daily, dependable forecasting that our viewers rely on.

Community service is a core part of our station's identity. We proudly partnered with Healing Appalachia for the Helene Benefit Concert, raising awareness and support for addiction recovery. Every June, we participate in Founder's Day of Caring, and this year, we volunteered at local humane societies to help clean and organize their spaces. That effort ties directly into our annual Clear the Shelter campaign and our

ongoing Mutt Mondays initiative, which highlights adoptable pets to help find them forever homes.

We also shine a spotlight on local businesses through our weekly Restaurant Road Trip series, helping small restaurants reach new audiences. Beyond that, we're active participants in local parades and public events, always showing up with our station mascot, Snowbird, to connect with families and children.

WBOY also actively supports numerous charitable and educational initiatives, including Mountaineer Boys State, the annual United Hospital Center Holly Ball Gala, Remarkable Women in our coverage area, the annual Mediathon where we partner with WVU Medicine Children's, Salvation Army Angel Tree, Hurricane Relief Concert & Supply Drive, and school career days. We've hosted station tours and even emceed community events, such as the Black History Month program with our local NAACP chapter.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms,

digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like 12 News WBOY-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Jim Dodrill

Vice President & General Manager

Dear Chairman Carr, April 4, 2025

On behalf of WBRE TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

We provide services for WYOU TV, which is owned by a separate company. We have worked under this relationship for nearly 20 years. It is obvious that operating two stations has not created an unfair advantage for us, in the face of ferocious competition from Big Tech. Our station's combined revenue does not surpass our top TV competitor, and the combined revenue spent with Big Tech companies surpasses all combined broadcasters.

Here at WBRE, we are deeply involved in the local community providing more than 50 hours of local news each week. Our Children First initiative has collected thousands of *Coats for Kids*, many tons of food for hungry children and inspired young people to seek meaningful careers. Our anti-drug messages have helped children and adults find their way outside of a life of drugs. We have also helped direct people during horrific floods, severe storms, a pandemic, and the opioid crisis. During weather emergencies, we have been the first line of defense for more than 72 years. In Northeast Pennsylvania, even more than other parts of the USA, viewers are heavily relying on Television to deliver these critical services.

WBRE also broadcasts PA Live! a one-hour daily lifestyle show featuring things to do and businesses around the region. We are the home to the broadcast of the annual Scranton St. Patrick's Parade for the past 15 years, one of the largest of its kind. We also bring coverage of the Little League World Series from Williamsport, PA that brings the world to our region.

Over the past 39 years I have personally worked in more than eight different TV markets: as large as Washington, DC and as small as Yuma, Arizona. In all those places, viewers have depended on their local TV stations to provide essential information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

In Northeast Pennsylvania, local newspapers like the Scranton Times and Wilkes-Barre Citizen's Voice, have been forced to decrease staffing and become increasingly regionalized and nationalized. This severely limits their operations and ability to enterprise quality journalism. As a result, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like WBRE are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing that our viewers rely on daily.

The current FCC ownership restrictions were originally intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist. The few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WBRE and WYOU are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. Imagine if Facebook or X were free to operate anywhere in the USA, except Seattle, Boston, Miami, Detroit, and Pittsburgh. To remain viable and continue providing high-quality local news, emergency information, and community programming. local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable WBRE, WYOU and other local broadcasters to expand and enhance our local news and community programming and continue investing in modern technology, innovation, and viewer services.
- Allow WBRE, WYOU and other local broadcasters to better compete with digital giants, like Google, which are not subject to the current restrictions on reach.
- Improve efficiency in our operation, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both our TV stations and the communities of Northeast Pennsylvania we serve.

Thank you for your attention to this important matter.

Sincerely,

Andrew Wyatt
Vice President & General Manager
WBRE Television / 2822News.com

GRAY SOAPES
VP/General Manager
gsoapes@wcbd.com

News 2
A Nexstar Broadcasting, Inc. Station

April 4, 2025

Dear Chairman Carr,

On behalf of WCBD-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WCBD has been a trusted source of information to the South Carolina Lowcountry communities we serve for over 70 years. Our commitment to bringing viewers breaking news and weather has become a standard of integrity and trust viewers expect from News 2.

We take great pride in our reputation as broadcasters who give important information in the over 45 hours of local newscasts we produce each week. Each day, hundreds of thousands of people who call the Charleston metropolitan area home entrust us to hold power to account and identify solutions to the problems that shape their daily lives. We take that responsibility even further, airing a daily lifestyle show, producing informative weather specials and extended election programming.

News 2 offers unparalleled coverage of local events and festivals, including the annual Martin Luther King Jr. Day Parade, the Cooper River Bridge Run, and the Southeastern Wildlife Exposition – events that are highlights of the year for our viewers and drive millions of tourism dollars back into our community.

Our commitment to integrating ourselves into the fabric of our community is unwavering. We are driven by the knowledge that in certain circumstances we are a lifeline to viewers and move into the role of a first responder. During severe weather, our viewers know they can depend on us before, during and after a storm to help keep them safe through these often-devastating events. Our wall-to-wall coverage, which stretched to 20 continuous hours during Hurricane Helene, serves as a lifeline for families in protecting themselves and their homes. We have had so many viewers thank us for telling them to "get into their safe rooms" as storms bear down on their neighborhood, or let them know how and where supplies are available. It's this connection and trust we have built with our community through the years.

But our dedication to serving the community extends far beyond our newsroom, it is instilled in the fabric of our entire organization. Each year since 1987, News 2 and the Lowcountry's Chief Meteorologist Rob Fowler has participated in Toys for Tots, an annual initiative sponsored by the

U.S. Marine Corps to ensure every local child has a toy under their tree on Christmas morning. We make appearances at more than 20 drop-off locations throughout the season and host a one-day donation blitz at the news station, collecting hundreds of thousands of toys for tens of thousands of children in the greater Charleston area.

Throughout the year, we are actively engaged in promoting the people and places that make our area special from our weekly "Cool School" initiative, which highlights exceptional local teachers, to our weekday "Pets on 2" segment where we showcase animals from local adoption shelters in need of a loving home.

All of this exemplifies our promise to keep our viewers engaged and informed, especially those whose access to critical information may be limited. As local newspapers continue to scale back operations, the role of television broadcasters is growing even more important. For example, Charleston's preeminent newspaper, the Post and Courier, recently announced that it would cease print delivery two days a week due to a decline in print subscribers. With around 20% of households in our viewing area not having access to reliable internet, television news may well be their only source of local journalism.

Still local stations, like WCBD, are restricted in our ability to keep up with today's rapidly evolving media landscape due to outdated FCC regulations that limit our broadcast capabilities.

The original ownership restrictions were put in place to promote competition and diversity in broadcasting at a time when streaming technology did not exist and the major broadcast networks dominated television. However, the industry has changed dramatically. Today, streaming platforms, digital content providers, and Big Tech giants wield vast influence, reaching households across multiple devices without any of the restrictions placed on local broadcasters. The reach limitations imposed on television stations place us at a severe disadvantage compared to these digital giants who are not bound by the same regulations, and continue to dominate the advertising and media distribution landscape.

Eliminating or modernizing these regulations would:

1. Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
2. Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
3. Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

The reality of today's media environment demands a reconsideration of outdated rules that no longer reflect current marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Gray Soapes
WCBD Vice President & General Manager

April 4, 2025

Dear Chairman Carr,

On behalf of DC News Now and DCW50 (WDVM & WDCW), I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WDVM and WDCW-TV, we are deeply connected with our community and have a rich heritage going back 55 years. From our origins covering Western Maryland, West Virginia, Southern Pennsylvania and parts of Virginia, our organization has expanded to cover the entire Washington, DC metropolitan region.

We produce more than 70 hours of local news, sports and lifestyle programming each week. Our mission is to super serve our region, placing a particular emphasis on coverage of our Washington, DC television market outside the beltway, reaching the more distant parts of the coverage area. We have physical offices in four counties in addition to our headquarters in DC to ensure we fulfill our commitment.

These stations regularly provide life-saving information during severe weather outbreaks, and we stay on the air until the threat has completely passed our viewing area. For example, in June, 2024, a total of 7 tornadoes touched down in the Virginia and Maryland region in a single evening. We remained on the air, uninterrupted by commercials or other programming, delivering real-time coverage of the storms as they rolled through the area. It is important to note that all of this was free, over-the-air, allowing us to serve as many households as possible. In an era where subscription fees for services and information have become the norm, we take enormous pride in knowing our community can access our information for free, no strings attached.

Beyond the local news broadcasts, our stations have hosted, participated in and promoted job fairs to help the overall well-being of our community members. We offer religious programming. We offer a 30-minute nightly sports program focused on local high school, collegiate and regional sports. We air a 60-minue lifestyle show five days per week that brings in a variety of restaurants, businesses and community leaders to talk about how they are each shaping the region we live in. Each week, we review developments in local politics through our weekly public affairs program. We always consider our community's interests when programming the stations.

Every year, our station employees participate in multiple charity projects, ensuring our team has a chance to give back to the community that we serve.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

A University of North Carolina survey concluded the Washington, DC region saw a decrease of 46% in the number of newspapers between 2004 and 2019. Even a popular digital-only news site went out of business in 2023. Some of the newspapers that still exist have merged and reduced operations and coverage.

WDVM and WDCW have stepped in to fill this void, ensuring the community still has access to vital news reporting that is thorough, fair, and professionally edited and free. Our station has invested in upgraded equipment and facilities to ensure continuity if there's a situation where we need to provide coverage during an extended emergency.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers increasingly rely on.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't exist and the few large platforms were the legacy Big 3 broadcast networks.

Those days are quite distant. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WDVM/WDCW-TV are at a distinct disadvantage.

The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Deleting or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants don't have limits on reach.
- Improve efficiency in operations, ensuring financial stability and allowing us to do significant planning for a strong future.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Ben Dobson
Station Manager
WDVM/WDCW-TV
2121 Wisconsin Ave NW
Suite 350
Washington, DC 20007

WDKY-TV | Lexington, KY

April 3, 2025

Dear Chairman Carr,

On behalf of WDKY-TV FOX 56, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WDKY-TV has been proudly serving Central Kentucky and the Bluegrass Region for almost 40 years, and we are deeply involved with the many local communities in our coverage area. While many broadcasters have unfortunately scaled back, we have invested millions of dollars into WDKY-TV over the last several years and have expanded our facility and business operation in Lexington. It's a commitment and responsibility we take very seriously for our viewers. We provide important breaking news, critical emergency updates and weather alerts, popular community programs, public service announcements, and are a valued and trusted source for local news and information. Now more than ever, maintaining free and over-the-air broadcast television is paramount, particularly for the underserved areas of Kentucky with limited resources and fewer available options.

Each week, WDKY-TV creates and broadcasts almost 50 hours of locally produced content including 35 hours Mon-Sun of "FOX 56 News" local newscasts, two M-F weekday lifestyle shows, "Live From Chevy Chase" and "The Lee & Hayley Show", a weekly political show titled "Red, White and Bluegrass" which airs ever Sunday, two weekly sports shows, "The OT" and "Around The Pitch", as well as many other special programs each year including "Home Team Showcase" focusing high school athletics, "Tragedy In The Mountains", a multi-state live flood relief special which helped impacted families in Kentucky, and the state's first-ever Gubernatorial Primary debate broadcast on 10 television stations, covering all Kentucky counties, and reaching every single television household in the state of Kentucky. Our television station is involved each and every month with various charitable organizations and we put a high priority on service and community work.

Beyond our state of Kentucky, television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local television stations like WDKY-TV are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments like we've made in Lexington and will be necessary for us to continue to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WDKY-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Monte Costes
Vice President & General Manager
WDKY-TV Lexington, KY

April 4, 2025

Dear Chairman Carr,

On behalf of WDTN-NBC and WBDT-CW, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WDTN-NBC and WBDT-CW we are deeply involved in the local community. Our News brand across both of our television stations is "Working for you". We produce and air 50 hours of LOCAL news each week for the Dayton market. That is 2,600 hours of annual local news in our community, nearly 50% more than our nearest local news competitor. In addition to our regularly scheduled news programming, we also create and air local news specials along with the first lifestyle show in the market, 'Living Dayton' every Monday through Friday at noon. 'Living Dayton' is celebrating its 13th year in the market. In the last six months we aired multiple specials and facilitated several community initiatives for Dayton. We helped support Hispanic Heritage Month in October, Veterans Month in November, and kicked off our 'Remarkable Women' initiative that has a lasting impact across the country with our parent company, Nexstar Media Group. This is an initiative that Nexstar focuses on across the country in all 116 markets looking for the women leaders in our local communities making a direct impact and difference in their market. We ask viewers to submit their 'Remarkable Women' candidates and we highlight 4 of those women here in Dayton. A woman leader is chosen from each of the Nexstar markets and will be flown to Los Angeles this month amongst her peers around the country to be honored with other successful women leaders. We will be airing a half hour special featuring the women on their trip in April 2025.

Our stations celebrated important milestones over the last six months with our two biggest initiatives in fourth quarter with our 42nd year of Coats for Kids as well as our 43rd year of Food for Friends community contributions. We helped deliver thousands of new and gently used coats to a non-profit group called FLOC – For the Love of Children that serves over 10,000 children in the Miami Valley. We also helped raise thousands of dollars and thousands of pounds of non perishable food items in conjunction with the Dayton Regional Foodbank to provide over 60,000 meals to the Miami Valley. And for another year, we helped raise over $165,000 of generous donations to our 40 year partnership with United Rehabilitation Services and their telethon event at the end of 2024.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism. Not only are the local initiatives and partnerships we have with non-profit businesses in the community important, we also play an integral role in keeping our community safe. Extreme weather impacts the Dayton area every year. In 2024, the Miami Valley saw more tornadoes than the total of tornado valley in the Midwest. We were on the front lines alerting our viewers and our community to prepare for the storms and take shelter. We had several viewers reach out to us over that coverage and thank our stations for alerting them to the tornadoes coming their way. We received accolades and thanks from the Dayton Fire Chief for our efforts to alert our community quickly and effectively. The spring season here in April is shaping up to be another volatile year of storms here in our community. Just last night, our weather team went live with multiple tornado warnings from 4pm to 2:30a in the morning, keeping our viewers updated down to the street level impact on where tornadoes could potentially touch down. No other station in the market went live through these storms like our team did. Our Storm Team 2 Meteorologists have been awarded the 'WeatheRate's Most Accurate Forecast' for seven years in a row. Our weather team has over 100 years of combined experience working here in the Miami Valley.

Last year, we celebrated our station's 75th anniversary. We continue to be deeply integrated into our local community. As successful local broadcasters, we continue to make strong investments in our local stations and communities with a goal to keep our viewers safe and informed. As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WDTN-NBC and WBDT-CW are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news,

emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve. We thank you for your support of local television broadcasting and for understanding its importance in our local communities.

Thank you for your attention to this important matter.

Sincerely,

Melissa Jones

Melissa Jones

Vice-President & General Manager

WDTN-TV and WBDT-TV

Dayton, OH

Nexstar Media Group, Inc.

Mark Higgins

200 S. Parker Street / Tampa, FL / 33606

April 3, 2025

Chairman Brendan Carr
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairman Carr,

On behalf of WFLA-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

For more than 70 years, WFLA News Channel 8 has a rich and trusted relationship in our community. The core of our brand is deeply entrenched in our service to Tampa Bay and encapsulated in our moniker "On Your Side". From annual hurricane coverage to local stories of importance, WFLA's mission is to notify the public of critical information so that area residents can make important decisions in keeping their families safe and prepared.

The fabric of "On Your Side" is woven throughout our 30 plus annual community events/projects from all ten counties in our viewing area. From our 70-year symbiotic relationship with the "Gasparilla Parade" partnership, to the American Heart Association's annual Heart Walk fundraiser, we pride ourselves in being a relevant, trusted voice and advocate.

Currently, between our flagship station WFLA-NBC (Tampa), our sister station WTTA-CW and our newly acquired WSNN (Suncoast's News Network, Sarasota) we produce a market leading 150 hours of local news on a weekly basis. As an industry trailblazer, WFLA has continued to innovate the broadcast landscape with new streaming content offerings, a new Hispanic division, investments in best of class technologies, and the expansion of local programming.

Television viewers in the Tampa Bay area and across the United States depend on their local TV stations to provide essential information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Additionally, local TV stations are increasingly the only remaining source of trusted, local journalism.

mhiggins@wfla.com (813) 314-5639

As local newspapers such as the St. Petersburg Times, and Tampa Tribune and radio stations go out of business, are forced to severely limit their operations, or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely on daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WFLA-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Mark Higgins
Vice President and General Manager

Jud Beck
VICE PRESIDENT/GENERAL MANAGER

April 2, 2025

Dear Chairman Carr,

On behalf of WFRV-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

This year, WFRV-TV is celebrating our 70th Anniversary of service to Northeast Wisconsin. Our commitment to this region is stronger than ever as we produce 40 hours of news programming each week for broadcast. We produce iconic local event programming like the Appleton Flag Day Parade, Fireworks over the Fox, The Packer Hall of Fame Induction Ceremony, The Appleton Christmas Parade and more. Seasonally, our sports department produces two and a half hours of weekly programming covering everything from high school sports to the Green Bay Packers. We have cherished franchises within our news including "Positively Wisconsin", "Hometown Heroes" and the "Dish on Supper Clubs". "Newsmakers" is a weekly community service program that is hosted by Tom Zalaski, our award-winning anchor who has been in the market 40 years. We are a highly dedicated, relevant and trustworthy servant to Northeast Wisconsin.

Our communities here in Packerland depend on WFRV-TV. We provide free access to life saving, breaking news and weather coverage. We provide emergency information that our staff across all skillsets is dedicated to providing. From our steady meteorologist's professionalism during a tornado warning to a receptionist coming in before dawn to process school closings in a snowstorm. We provide community service airing thousands of PSAs for local Non-For-Profits, and stories in our news featuring the challenges and the solutions these organizations navigate. We feature the people that make Wisconsin special, living right here as neighbors. WFRV-TV brings people together with fact-based reporting from professional journalists. We are accessible. We talk with our viewers every day; we listen to them, and we are responsive.

We do all of this, but we in broadcasting now compete with the largest tech companies in the world. The media marketplace has changed significantly since ownership rules were first enacted. Despite these massive changes, the regulations that govern broadcasting remains stuck in the past. These FCC restrictions prevent stations from growing, stifling innovation and investment.

WFRV-TV, 1181 EAST MASON STREET, GREEN BAY, WI, 54301 / 920.430.3671
Jud.BeckA@WeAreGreenBay.com

Jud Beck
VICE PRESIDENT/GENERAL MANAGER

At the same time, Big Tech operates without any regulations and has access to 100% of the global audience. These rules severely limit local TV station's ability to compete while Big Tech and global streaming services remain completely unrestrained.

Without changes to the rules, many of the services that Americans rely on for free from local TV could disappear, including news, live sports, and weather updates. The time is now to level the playing field by rolling back these outdated restrictions so that local broadcasters can continue to serve, listen to and be responsive to our communities.

We urge the FCC to take swift and decisive action, ensuring a fair and competitive environment that benefits both the local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Judson Beck

Judson Beck

Vice President & General Manager

WFRV-TV Green Bay, Wisconsin

WFRV-TV, 1181 EAST MASON STREET, GREEN BAY, WI, 54301 / 920.430.3671
Jud.BeckA@WeAreGreenBay.com

FCC Chairman Carr
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairman Carr,

On behalf of WFXR and WWCW, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WFXR and WWCW take our responsibilities to our communities seriously. We are committed to inform, educate and entertain our viewers as a trusted source. WFXR News produces 42 hours of live news every week. Our local news coverage includes breaking news, severe weather, Amber Alerts and in-depth high school sports coverage.

Beyond our newsroom, as supporters of local businesses and community organizations, we broadcast and sponsor events from the Salem Fair, Olde Salem Days, the Lynchburg Heartwalk and many more. Each quarter we air hundreds of public service announcements and we create local public service campaigns that range from our "Hunger to Hope" initiative, helping increase awareness so we can eliminate food insecurities, to our partnership with the Virginia State Police with the "Y.O.V.A.S.O." (Youth Of Virginia Speak out about Traffic Safety) project and the live broadcast of the annual Drumstick Dash in Downtown Roanoke, which helps to raise hundreds of thousands of dollars each year for the Rescue Mission of Roanoke. All this is done to serve our local communities watching our free over-the-air broadcast television stations.

Television viewers across central and southwest Virginia depend on WFXR News to provide them with important information that directly affects their lives. Local TV stations are often the first source to which people turn for news and information and, increasingly, we are the only remaining source of local journalism. Our once dominant daily newspaper, the Roanoke Times, downsized by eliminating most of its journalists. As other media go out of business, are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still,

local stations like ours are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WFXR and WWCW are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

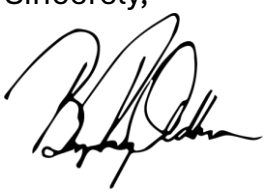
Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,



Benjamin Oldham
Vice President & General Manager
WFXR / WWCW Roanoke-Lynchburg, Virginia

WGMB-TV | WBRL-CD | KZUP-CD
10000 Perkins Road
Baton Rouge,LA 70810

April 2nd, 2025

Brendan Carr
Chairman, Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairman Carr,

I am writing on behalf of Fox Affiliate WGMB-TV, CW Affiliate WBRL-CD, and Independent KZUP-CD, all based in Baton Rouge and proudly serving southeast Louisiana and southwest Mississippi.

As a veteran broadcaster with almost 40 years of service to the industry, I have had the privilege of witnessing firsthand the profound impact that local television has on our communities and I am writing as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. Over the course of my career, I have had a ringside seat to experience the constant evolution of the media landscape, and I can attest that these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms. Platforms that have no meaningful connection and no obligations to serve our local community.

Here in Baton Rouge, we are more than just a media outlet. We are a trusted neighbor deeply involved in our local community. We air almost forty hours of local news coverage per week. We are the only television operation in Baton Rouge that still produces a weekly political and governmental affairs program. When severe weather breaks out or hurricanes threaten our homes, we don't just report the news; we stand with our viewers through the storm, delivering lifesaving information for days on end. We champion our local universities, LSU and Southern University, a legacy HBCU. And we don't just cover stories, we take action working with organizations like The Greater Baton Rouge Food Bank, The American Cancer Society, The National Alliance on Mental Illness and many local homeless shelters through the St. Vincent DePaul Society trying to make a tangible difference in people's lives. Through our partnerships with local animal shelters, we have helped place hundreds of adopted pets into their forever homes annually. We do all of this not just to inform, but to build connections, to foster understanding and to strengthen the communities we serve.

In every community across these great United States, people depend on their local TV stations to provide them with important information that they both want and need to know. We are not only dedicated to providing up to the minute information, but we also directly impact lives every day providing local news, weather & sports coverage. Here in Louisiana, we often find ourselves being the first to alert with lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

Despite all of these good efforts, Stations like ours are struggling under the weight of regulations that fail to reflect the reality of today's media landscape. Over our careers, you and I have stood as witness to the decline of local journalism. We have observed once vibrant local newspapers and radio stations go out of business or severely cut back operations leaving their local communities with fewer viable sources of local information. The role local

broadcasters play in disseminating accurate information is more important than ever. Local broadcasters remain one of the last standing pillars of independent journalism. Still, local stations like ours are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. We need relief. We need the flexibility to evolve and grow. Without it, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity. Those restrictions were conceived at a time when streaming technology didn't even exist. The few large platforms at the time were the legacy Big 3 broadcast networks. That is no longer the case. In today's world Big Tech giants dictate what gets seen, siphon advertising dollars away from local outlets, and operate without the same public service obligations. With streaming platforms, digital content providers, and Big Tech now dominating advertising and media distribution, local broadcasters like WGMB, WBRL, and KZUP are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to evolve and grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tim Ingram
Vice President & General Manager
WGMB-TV | WBRL-CD | KZUP-CD

CHICAGO'S VERY OWN
WGN 9

Dear Chairman Carr,

On behalf of WGN-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WGN-TV recently celebrated 75 years of news, entertainment, sports, and community, by taking a look back at its historic journey to becoming Chicago's Very Own. We paved the way for groundbreaking daytime talk shows like Phil Donahue and local children's programming like the beloved *Bozo Show,* which spanned over four decades. Today, we proudly deliver over 87 hours of local programming each week, more local news than any other Chicago station, keeping our viewers informed, engaged, and connected to the city and surrounding communities. From trusted news coverage to lifestyle and entertainment shows, our local content reflects the heartbeat of Chicago. During severe weather events like tornadoes and flooding, our experienced weather team provides continuous, real-time updates to keep the public safe and informed.

At WGN-TV, we understand our responsibilities to our community reach far outside of our studio walls. The station is deeply rooted in the community through charitable initiatives, including our annual Toy Drive and Food Drive, which support families during the holiday season. We also raise funds year-round for WGN-TV Family Charities, a fund of the Robert R. McCormick Foundation, our station's nonprofit organization dedicated to helping those in need across the Chicago area. Since its inception in 2021, we have given nearly $320,000 in grants to charities such as the Greater Chicago Food Depository, Christmas in the Wards and the Off the Street Club. These organizations work tirelessly to create change in their respective sectors, and we consider ourselves fortunate to be a part of it.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local TV broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WGN-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the

restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Ric Harris
Vice President & General Manager
WGN-TV

Dear Chairman Carr,

On behalf of WGNO-TV and WNOL-TV New Orleans, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WGNO/WNOL are deeply involved in the local community via not only our local news, but also with a dedication to local student athletes. Our sports department locally produces over 30 weeks of high school sports programming shows yearly including Friday Night Football, Friday Night Sports, and Friday Night Fastball. We are the only entity dedicating this many hours to highlighting the accomplishments of local high school student athletes. WGNO News goes on the road to underserved communities six times per year as we highlight the unique aspects of the towns, events, and history. This year the WGNO News on the road will be in Ponchatoula, Thibodaux, Slidell, Mandeville, Bogalusa, and Gretna.

Each year WGNO and WNOL execute our "Coats for Kids" campaign as we collect coats for needy children from November to January each year. Thousands of coats are collected, cleaned, and then distributed to children at local schools in need. We partner with numerous local events who raise money for various causes including our annual partnership with "Shuck Cancer." Each year our news department produces local programs that highlight community organizations that are trying to better the Hispanic and African American communities. Each week our "Moving New Orleans Forward" newscast segments highlight organizations around the Greater New Orleans area that are doing their part in trying to improve their local communities. One of our biggest initiatives of the year is Remarkable Women. WGNO accepts New Orleans Remarkable Women nominations during the month of December and then highlights these women and their causes in news stories each winter. In the spring we air a locally produced special highlighting the top Remarkable Women in our city and announce a winner who travels to Los Angeles to be recognized with other Remarkable Women from across the country.

1 Galleria Blvd, Suite 850, Metairie, LA 70001

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. In September 2024, WGNO was at the forefront of delivering valuable information for Hurricane Francine as it directly hit New Orleans. That hurricane came on the heels of 2021's Hurricane Ida which delivered a massive blow to Southeast Louisiana. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism. This January WGNO was the first on the scene of the tragic terror attack on Bourbon Street on New Year's Eve. Our station was there during the chaotic early hours as the event unfolded bringing valuable information to the community.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WGNO/WNOL are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.

- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

John Cruse
WGNO/WNOL
Vice President & General Manager

1 Galleria Blvd, Suite 850, Metairie, LA 70001

The Stations Of OurQuadCities.com

Dear Chairman Carr,

On behalf of The Station of OurQuadCities (WHBF, KGCW and KLJB - DMA #104), I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

The Stations of OurQuadCities are deeply involved in the local community... more than 75 years ago WHBF was the first television station in the state of Illinois outside of the Chicago area to broadcast information and entertainment to the communities of Eastern Iowa and Western Illinois. Our stations produce eight and a half hours of local programming each weekday and nearly 45 hours of community-based programming each week. We provide life-saving weather information and local news and community information to approximately 470,000 people. Each year our stations work with more than 80 local organizations, agencies, and non-profit groups to promote, provide coverage and volunteer for community events. In 2024, we provided over three million dollars in airtime to inform, advertise and support public service endeavors.

Television viewers in communities across the Quad Cities Eastern Iowa and Western Illinois, depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily. The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WHBF, KGCW and KLJB are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Nexstar
MEDIA GROUP, INC.
231 18th Street Rock Island, IL
309-786-5441
OurQuadCities.com

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

J. Patrick Baldwin

Patrick Baldwin

Vice President & General Manager

Nexstar
MEDIA GROUP, INC.
231 18th Street Rock Island, IL
309-786-5441
OurQuadCities.com

Dear Chairman Carr,

On behalf of WHO13 TV, located in Iowa's capital city of Des Moines. I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules which (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local communities.

WHO 13 has been a megaphone for Central Iowa for more than seven decades. We have more hours of local programming than competitors in Iowa, which includes more than 44 hours of weekly news, five hours of local lifestyle show programming, two plus hours of local sports programming, and are one of the only affiliates in the country to broadcast live high school football games. In addition, we provide dozens of hours of local community and charity event coverage including the internationally renowned Iowa State Fair and the nationally celebrated Des Moines Arts Festival and many more. We take great pride in our leadership role as a trusted source of news, information, weather, and emergency updates. We are Iowa's leader in weather converge, and employee six metrologist exceeding 112 years OF LOCAL DES MOINES WEATHER experience. Our station is committed to keeping our community informed and engaged by broadcasting LIVE seven days a week. Alert, defend, and protect! When severe weather hits the Iowa plains, we go LIVE and COMMERCIAL FREE to alert viewers and keep them out of harm's way, no matter how long it takes!

In addition to our live news and entertainment programming, we are involved in strengthening the fabric of our community. Each quarter, we air thousands of public service announcements dedicated to supporting charitable organizations and community events. From covering severe weather to amplifying the voices of local leaders and organizations, WHO 13 continues to make meaningful advancements and investments in the well-being of our viewers. Maintaining free, over-the-air broadcast television to as many households as possible has never been more important, particularly for those in underserved or rural areas of Iowa who rely on us for critical information.

Television viewers across Iowa and the surrounding communities depend on WHO 13 to deliver the local news, weather, and emergency information that directly impact their daily lives. As local newspapers and radio stations continue to shut down or scale back operations, the role of local broadcasters has become even more vital. For example, the readership of the *Des Moines Register* is down about 80% in the past decade and is now printed only a few times each week. The *Register* maintains only a handful of local writers on staff so local stories continue to decline WHO 13's 10:00 P.M. news average alone reaches more than the paper's Sunday addition in our area. Radio groups in Iowa have also paired down staff and seem to have all but given up on local news operations. This is especially apparent during breaking news and weather emergencies where they continue to play regular programming instead of RELAYING CRITICAL AND POTENTIALLY LIFESAVING INFORMATION. WHO 13 has stepped up to

fill the void as these traditional information sources diminish, ensuring that critical local news and emergency information remain accessible to the community. Despite these efforts, stations like WHO 13 continue to face significant challenges because of outdated FCC rules which limit our ability to compete fairly in today's rapidly evolving media landscape. Without regulatory relief, we will struggle to make the necessary investments to sustain the vital news source and programming our viewers need.

The original broadcasting ownership restrictions were put in place to promote competition and diversity at a time when streaming technology did not exist and the major broadcast networks dominated television. The industry, however, has changed dramatically. Streaming platforms, digital content providers, and Big Tech giants wield vast influence today. They reach households across multiple devices WITHOUT ANY OF THE RESTRICTIONS OR REGULATIONS PLACED ON LOCAL BROADCASTERS. The reach limitations imposed on television stations place us at a severe disadvantage compared to these digital giants who continue to dominate the advertising and media distribution landscape.

Eliminating or modernizing these broadcasting regulations would:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms which currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.
- Allow us to keep and even ADD more local jobs.

The reality of today's media environment demands a reconsideration of outdated rules which no longer reflect marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions to ensure a fair and competitive environment which benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Robert Totsch

Vice President & General Manager

Dear Chairman Carr,

On behalf of ABC27/ WHTM Harrisburg PA., I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that place a cap on the percentage of the country's television households that a broadcast company may reach limiting the amount of TV stations that can be owned by any company. The days of limiting coverage areas is long gone as streaming platforms and social media sites like Hulu or Facebook can reach the entire country in many cases with our own content with no restrictions.

Here at WHTM we are deeply involved in the Harrisburg local community. We provide 35 ½ hours a week of local News programming in addition to a local lifestyle show, "Good Day PA" that provides great information for our viewers. We have been a pillar of the Harrisburg community since 1953 providing vital weather and traffic information daily and keeping residents abreast of local issues including but not limited to Sports, Political Debates, Townhalls, Food drives to name a few, in addition to covering a parade just this year for our recent NFL champions, The Philadelphia Eagles.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism. Newspapers in our market like, The Paxton Herald and The Lebanon Bulletin have long since gone out of business making our jobs that more important.

As the landscape continues to change and evolve in our industry, it seems to me that fairness would be having everyone in the industry subjected to the same rules. In this case if, allowing TV stations to be able to grow and compete with the Facebooks of the world, but we can't under the current FCC rules due to caps imposed on TV

stations that are not imposed on streaming platforms or any of the “Big Tech” companies. Facebook, as an example, does not hire any journalists and use our content across the entire country monetizing our content with no restrictions. Can you imagine if you could only have Facebook in the East and West coast but not in the Midwest? It’s not even fathomable to imagine that scenario. But for us in the TV world, it is our reality. A fair playing field would be to have the FCC change it’s current rules on ownership caps. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Level the playing field for everyone.
- Improve efficiency in operations, allowing for more robust news coverage

The reality of today’s media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry’s competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

David Bangura
Vice President & General Manager,
WHTM/ABC27, Harrisburg PA.

Dear Chairman Carr,

On behalf of WJBF-TV, Augusta I am writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here WJBF we are deeply involved in the local community in Georgia and South Carolina.
At WJBF we take our commitment to our local communities very seriously. We produce slightly more than 45 hours a week of local news, hyper local community content, local sports and more. WJBF is a trusted resource of our community to deliver news, weather and all other pertinent information. We were needed even more this year as Hurricane Helene ravaged our area.

Our commitment to the community is also seen as we honor volunteers with our Giving Your Best Program and teachers through awarding Golden Apple Awards. We shine a positive light on many that may not receive their needed recognition. Big Tech is not doing this and cannot do it. WJBF can and does!

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism. I have seen this first hand during the trying year that the Augusta area has survived.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local

necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WJBF are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Carter Murphy
Vice President & General Manager
WJBF-TV, Augusta-Aiken

8455 Peach Street Erie, Pennsylvania 16509 (814) 864-2400

Aprill 4, 2025

FCC Chairman Carr
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairman Carr

On behalf of WJET and WFXP, I write as part of the In re: Delete, Delete, Delete proceedings to urge the Federal Communications Commission (FCC) to eliminate the current rules that place a cap on the percentage of the country's television households that a broadcast company may reach and limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that take enormous amounts of advertising revenue out of our market without providing any meaningful content or support for the local community.

Conversely, our local team at WJET and WFXP is highly engaged and takes our responsibility to local journalism seriously. Our entire staff live and participate actively in community organizations across our region. We currently produce 39 hours of local news, weather and information weekly. In addition to local college and high school athletes, we provide extensive coverage of the Erie SeaWolves (AA Baseball) and Erie Otters (AHL Hockey). Each month we recognize exceptional teachers with our Golden Apple Champaign and annually we celebrate graduating high school seniors. Programs like the Shriner's Telethon, Bloom Under the Moon, Flu-a-Thon, Festival of the Trees and Amber Alerts benefit from our support. Every year, we provide an extensive commitment to airing public service announcements for local charities and community initiatives.

Your support in modernizing the antiquated regulations would enable local broadcasters to:

- expand and enhance the local news and community programming
- continue investing in new technology, innovation and viewer services
- better compete with digital media giants that are not subject to restrictions on the size of their company or reach into local markets across the country
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning

The landscape of media has changed dramatically, and we respectfully ask that legacy rules are modified to enable us to protect local journalism. We urge the FCC to take swift and decisive action in eliminating the restrictions on media ownership to level the playing field enabling us to continue to serve local communities across this great nation.

8455 Peach Street Erie, Pennsylvania 16509 (814) 864-2400

Thank you for your time and attention to this important and timely matter.

Sincerely,

Theresa Underwood
SVP & Regional Manager
Acting VP & General Manager WJET-TV/WFXP-TV
8455 Peach Street
Erie, PA 16509

April 4, 2025

Dear Chairman Carr,

On behalf of WJTV-TV in Jackson, MS and WHLT-TV in Hattiesburg, MS, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WJTV and WHLT are deeply embedded in the communities we serve, living up to our brand promise: Focused on You. WJTV, located in Jackson, signed on January 20, 1953, as Mississippi's first television station. WHLT in Hattiesburg operates as a semi-satellite of WJTV, simulcasting newscasts while maintaining a local presence with two dedicated reporters producing localized content. We take immense pride in being a trusted source for news, information, and emergency alerts. Staying true to our brand, we focus on the community, economy, health, safety, and local leadership, keeping our viewers informed and engaged with live broadcasts seven days a week. We deliver over 44.5 hours of live local news and community programming each week, including Mississippi Insight, Live@9a, and The Daily Sip. Our stations provide unmatched local coverage, including breaking news, Amber Alerts, severe weather updates, and in-depth reporting on the stories that matter most to Mississippi residents. Television viewers in Jackson and Hattiesburg, MS and the surrounding communities depend on WJTV and WHLT TV stations to deliver the local news, weather, and emergency information that directly impact their daily lives.

Beyond the newsroom, WJTV and WHLT remain passionately committed to serving our local communities and the state. Through our monthly Your Hometown series, we spotlight a selected city or town by broadcasting live from that community during all newscasts each Friday. These segments feature interviews and stories that celebrate the unique people and places of Mississippi. We also air thousands of public service announcements to support charitable organizations and promote community events. Our commitment to comprehensive local coverage was especially evident during the 18 tornadoes that struck Mississippi on March 14–15, damaging more than 1,000 structures and resulting in injuries and fatalities. In addition, WJTV recently partnered with Jackson State University to produce and moderate a live televised mayoral forum for the City of Jackson. Through initiatives like these, we continue to invest in the well-being of our viewers. Maintaining free, over-the-air broadcast television has never been more vital, especially for underserved communities who depend on us for timely and essential information.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WJTV and WHLT are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Jeffrey D. Guy
Vice President & General Manager
WJTV-TV/WHLT-TV CBS Affiliates

1820 TV Road | Jackson, MS 39204 P. 601-969-4605 | jguy@wjtv.com

FOX 8 WJW · CLEVELAND WBNX TV 55 AKRON / CLEVELAND

April 3, 2025

Dear Chairman Carr:

I am writing on behalf of **WJW FOX 8** and **WBNX TV55**, as part of the *In re: Delete, Delete, Delete* proceedings, to urge you to consider eliminating the current outdated ownership regulations, specifically the rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. These rules, established decades ago, do not accomplish their original purpose in this significantly changed media landscape, and in fact, create imbalance as local broadcasters attempt to compete with "Big Tech", and the unrestricted platforms that they represent.

At WJW-TV, we are proud of our history and legacy, serving the Cleveland/Akron (Canton) market since 1949. We have a strong bond with our viewers and take very seriously our responsibility for delivering accurate and insightful local news. WJW-TV produces **13.5 hours of news and local content** Monday through Friday and is particularly respected for our coverage of breaking news, weather and investigative journalism. Ranked #1 in every newscast as well as dominating our competitors in digital and social media presence, WJW is a leader in Northeast Ohio, and we pride ourselves on our connection to this community. Our reputation for being known as "Cleveland's Own", is reflected through everything we do, from on-air talent with local roots, to finding the local relevance in every story for viewers.

WJW-TV, however, delivers much more than news. For example, over the past 13 years, we have helped raise over $25 million dollars for St. Jude through our annual "St. Jude Dream Home" event. The Woollybear Festival, created by a WJW meteorologist in 1972, is one of the largest in Ohio, and provides a place where viewers interact with on-air personalities. WJW's "Voices of Unity" series highlights local stories of people bringing our community together. WJW has hosted U.S. Senate primary debates and has helped raise cancer awareness drawing from the personal experiences of our anchors. From "Stuff the Bus" to the annual "FOX Trot" events, and the many causes we support, WJW-TV is woven into the fabric of this community.

Maintaining free, over-the-air broadcast television to as many households as possible has never been more important as local newspapers and radio stations downsize or go out of business. Yet the archaic FCC rules and regulations are standing in the way of local broadcasters, like WJW-TV, fulfilling that mission. Without regulatory relief, local television stations may end up like other local media, unable to support the investments needed to continue producing the news, emergency information, and community programming that contributes to a thriving community.

The days of needing TV ownership restrictions have passed, and it is time to address the needs and challenges of the current industry. Updating these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of irrelevant rules that ignore the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Paul J. Perozeni
Vice President General Manager
WJW FOX 8/WBNX TV55

Dear Chairman Carr,

On behalf of Queen City News/WJZY, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WJZY we are deeply involved in the local community not only in the Charlotte coverage area, but into the mountain counties of western North Carolina that were devastated last summer by Hurricane Helene. Our community involvement does not stop at the state line though. We also report on local issues and stories occurring in our viewing area across the state line into South Carolina. WJZY-TV went on the air in 1987 as an independent station and began producing news in January of 2014. Since 2020 when WJZY was purchased by Nexstar Media Group, Inc, we have invested millions of dollars in people and equipment to make the operation a unique source for local news. Since 2020, we have added 25 hours of weekly local news programming, bringing our total to 73 hours of local news per week, the most of any television station in Charlotte. In 2024, we launched a new local lifestyle show, Positively Charlotte, which informs and entertains viewers by highlighting the people, places, businesses, and events that make up the communities we live in.

With the largest staff and most local news produced each week, Queen City News has quickly become the Charlotte area's most reliable source for emergency weather coverage. During Hurricane Helene, our Pinpoint Weather Team accurately predicted the catastrophic flood conditions three days before the rains started. Our chief meteorologist encouraged families in the mountains to make plans to evacuate more than 48-hours out, undoubtedly saving lives. And when the rain stopped, Queen City News not only covered the devastation, but also highlighted the rescue and recovery efforts. That commitment has not ceased. This spring, we are

revisiting western North Carolina communities to update the progress as part of our *Helping Our Hometowns* series.

Queen City News has co-produced two statewide debates along with our sister stations in North Carolina. We have the only fulltime political reporter, business reporter, practicing lawyer and licensed commercial pilot on local television. All show our commitment to make the Charlotte audience better informed in the areas that impact their lives.

Queen City News Investigative reports sparked federal criminal indictments against a local sheriff and the removal of a corrupt judge. Neither would have come to light without our efforts.

Additionally, Queen City News is the most popular local news source in Charlotte on YouTube. Over the last five years, more than 165 million news videos have been watched on our channel. These are stories reported on by our local journalists and is evidence that the public wants more local news content produced by local journalists, not less.

Local television brings the community together in times of crisis and celebration. Local journalists live in the neighborhoods we report on, worship in the same worship places as our viewers, and shop in the same stores. We are accountable to our neighbors. The work we do cannot be replaced by big tech companies who don't cover local communities the way we do and the way we can.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WJZY/Queen City News are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Joe McGuire

Vice President & General Manager

April 7, 2025

Dear Chairman Carr,

On behalf of WKBN-TV in Youngstown , Ohio, I write in reference to the *in re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local stations like WKBN to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

For more than 70 years WKBN-TV has been deeply involved in the local community…Every Monday through Friday we regularly broadcast 4 ½ hours a day of local news, weather and sports content. Every day of the year, 7 days a week, we serve our community, over 27 hours of local news every week. Every year we air thousands of local public service announcements supporting our local charities and organizations and their missions in our town. Our stations annual Caring for Our Community campaign also serves our viewers with annual scholarships to high school students, grants to teachers in creative classroom projects, and vital identification kits to families with young children. Our employees serve on the board of The Regional Chamber of Commerce, The United Way, The Boys and Girls Club, The Salvation Army, The Better Business Bureau, local rotary clubs, and more.

Television viewers in communities across the United States, just like here in eastern Ohio and western Pennsylvania depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. In times of crisis, we take that obligation to inform the public very seriously. At no time was this more evident, than when a Norfolk Southern train derailed late one night in February of 2023 in East Palestine, Ohio, less than 15 miles from our station's studios. We spent days, weeks and months covering that event, and more importantly, the serious aftermath of the toxic chemicals released into the local community. The impact to that community

and the issues that arose from that derailment are still ongoing, more than a year later. In spite of the fact that all the major TV networks and national cable companies descended on that train derailment site, local TV stations are often the first place people turn to in a crisis. Local viewers trust us because we are a part of the communities that we cover. More and more, local TV stations are the only remaining source of local journalism.

As local newspapers, like the Youngstown Vindicator that ceased operations in the summer of 2019 and many radio stations that go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WKBN-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

David Coy
Vice President & General Manager
WKBN-TV Youngstown, Ohio.

NEWS 2 abc
441 Murfreesboro Pike Nashville Tennessee 37210

Dear Chairman Carr,

On behalf of WKRN News 2 Nashville, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WKRN News 2 we are deeply involved in the local community, which expands to 49 counties in Middle Tennessee and impacts 3.14 million people.

Every week, we produce over 51 hours of local news and community-oriented content through local news, community affairs, and a local lifestyle show.

WKRN is a leader in local weather coverage across Middle Tennessee and Southern Kentucky, which is historically susceptible to severe thunderstorms, tornados, and floods. Recently on April 2nd our Chief Meteorologist was on air for 20 hours delivering up to the second updates and of watches and warnings and projected timelines of severe storms to 49 counties in Tennessee and Kentucky.

Beyond our local news coverage WKRN is extremely involved and invested in our local communities. We have partnered with St Jude's Children's Hospital for the last 7 years and raised over $12,000,000 to help children and families with childhood cancer and research. In 2024 we raised $2.2 million and are targeted to raise $2.3 million in 2025 for St Jude's. Each year we partner in the fall with Second Harvest Food Bank and raise over $300,000 annually in donations for families that suffer from food insecurities. In addition, we partner annually with the Nashville Rescue Mission in providing holiday meals for the homeless and those that struggle to put food on the table. We are heavily invested in weekly acknowledgement of Educator of the Week and honoring First Responders throughout our viewing area with 2 Gives Back.

All of this clearly demonstrates WKRN's commitment to the Middle Tennessee community and the viewers we serve. This November WKRN will celebrate 72 years in serving the fabric of Middle Tennessee.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, amber alerts, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

NEWS 2 abc
441 Murfreesboro Pike Nashville Tennessee 37210

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

Eliminating and modernizing current FCC Broadcast Regulations would:

- Enable local broadcasters to expand and enhance local news and community programming ensuring continued investment in innovative and viewer services.
- Allow local broadcasters to compete more effectively against the Big Tech digital platforms that currently operate without similar reach or regulatory restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to meet the technological advances in serving our local communities all while free over the air and connected TV platforms.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics and challenges. I urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive playing field that benefits local broadcasters and the communities we serve.

Thank you, Chairman Carr, for your attention and action on this important matter.

Sincerely

Mike Spruill
Vice President & General Manager
WKRN-TV Nashville, Tennessee

WLNS TV 6
2820 E. Saginaw Street
Lansing, MI 48912

April 4, 2025

Dear Chairman Carr,

On behalf of WLNS, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WLNS we are deeply involved in the local community. We produce 32 hours per week of local news and content, and we have a dedicated digital staff 24/7 to keep the local community informed of news and weather as it happens. In the capital of Michigan, we produce the Capital Rundown, providing viewers with an opportunity to hear from various elected representation each week. We've produced and aired Congressional and local Mayoral debates. We also produce the official Michigan State University coaches show that airs throughout the state, providing viewers with news on one of their favorite teams.

We are an integral part of keeping viewers informed of local weather. We invest heavily in advanced weather technology to provide accurate forecasts that include street level radar. Just this week we had nine confirmed tornadoes as well as dangerous straight-line winds and flooding in lower Michigan. We were live on-the-air, online and on social media to keep viewers informed and to provide life-saving information. We also invest in a traffic system to inform viewers of driving conditions and road closures.

We have partnered with Crime Stoppers for decades, assisting the local police in catching hundreds of wanted felons. Almost daily we inform the public of alerts from various police departments throughout our region, such as shelter-in-place orders while the police are searching for violent criminals. On the night of the Michigan State University shooting of numerous students, we broadcasted live for five hours, three of which the shooter's location was unknown as the entire community was terrified and locked in their homes. Once a picture of the shooter was broadcast on local TV, a viewer reported a sighting, and the shooter was found in under 20 minutes.

We support local charities continuously throughout the year. We are annual partners with the Izzo Legacy Foundation that raises hundreds of thousands of dollars for numerous local charities. We partner with our local food banks at the local holidays, last year collecting almost 3,000 pounds of food and $13,000 in donations. We collect school supplies for children, promote local hospital fundraisers, and support numerous other local charities all year long.

We continuously develop content to address serious issues in our community. We recently produced and aired a series on the dangers of fentanyl, sharing stories of local families who have lost loved ones to

overdose, and local places where people can get help. We invited the local Sheriff to help us collect hundreds of pounds of unused drugs from viewers to keep them out of the hands of children. We aired a series of stories on gun safety to raise awareness for the dangers to children around loaded guns, and then we bought and gave away hundreds of gun locks to local viewers. We produced and aired a series on mental health, that in addition to winning a national Mental Health America award, caused a local mental health facility to shut down their advertising because they were at capacity.

Our entire mission is to serve our local communities with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. During the pandemic, our local news ratings doubled. We know viewers rely on local broadcasters for important information.

The Lansing State Journal is down to 17,000 subscribers. Local broadcast is the dominant remaining local news for our community. We provide local news, weather, and sports for a local group of radio stations. However, we are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. Without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming our viewers rely on.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech dominating the advertising and media distribution sectors, local broadcasters like WLNS are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech competitors.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Marci Daniels

Marci Daniels
WLNS
Vice President and General Manager
O – 517-367-2180
mdaniels@wlns.com

Dear Chairman Carr,

I represent WMBB and CW in Panama City, Florida, WRBL in Columbus, Georgia, and WDHN in Dothan, Alabama. I am writing in regard to the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape changes rapidly, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

At WMBB, Panama City CW, WRBL, and WDHN, we are deeply involved in the local community. We produce more than thirty hours a week of local newscasts in each of these communities. I'm sure you remember Hurricane Michael devastated Panama City in 2018. WMBB warned people in our viewing area for days leading up to the hurricane. We stayed on the air during the category five hurricane and broadcast for days as we helped the people of Panama City start the complicated process of rebuilding their lives. The teams at each of our stations is ready at a moment's notice to provide lifesaving weather information or step in when a need arises in our communities.

Television viewers in communities across the United States depend on us to provide essential information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn for news and information and, increasingly, the only remaining source of local journalism.

Our local newspaper is a shell printing stories from areas that have little impact on our local community. Most of the radio stations in our community have been forced to record their programs or use national formats. The role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local

television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WMBB in Panama City, Florida, are at a disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in modern technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tracey Rogers

Tracey Rogers

Vice President & General Manager

April 4, 2025

Dear Chairman Carr,

On behalf of WMBD-TV in Peoria, Illinois, I write in response to the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate outdated regulations that:

1. Cap the percentage of television households a broadcast company may reach nationwide.
2. Limit the number of stations a broadcast company may own in a single local market.

As the media landscape evolves, these restrictions hinder local broadcasters' ability to compete with "Big Tech" in an increasingly digital marketplace dominated by a few powerful platforms with no meaningful connection to our local communities.

For nearly 70 years, WMBD-TV has served Central Illinois, delivering essential news, weather updates, and local coverage. Our dedicated journalists strive to provide fair, balanced reporting that tells the full story. Just this week, we provided wall-to-wall coverage to keep viewers informed and safe during severe thunderstorms.

Beyond news, WMBD and WYZZ actively support our community through partnerships with organizations such as Easterseals, the Center for Prevention of Abuse, and the Salvation Army. Our commitment extends beyond reporting—we engage in initiatives that foster a more connected and compassionate Central Illinois.

As local newspapers and radio stations struggle to survive, the role of local broadcasters in delivering accurate, community-focused information has never been more critical. We have expanded our local footprint, airing 8.5 hours of local news programming each weekday, along with weekend newscasts. However, outdated FCC regulations place unnecessary burdens on stations like WMBD, making it increasingly difficult to invest in the high-quality journalism and programming our viewers rely on.

The original ownership restrictions were designed to promote competition and diversity at a time when streaming technology did not exist, and the major broadcast networks dominated the media landscape. Today, digital giants and streaming platforms have reshaped the industry, yet only broadcasters remain constrained by regulations that limit their growth and competitive potential. Unlike Big Tech, which reaches multiple devices in every household without restriction, local broadcasters are subject to arbitrary caps that stifle innovation and investment.

Modernizing these regulations would:

- Enable local broadcasters to expand and enhance news coverage and community programming.
- Allow broadcasters to compete more effectively with digital platforms that operate without similar restrictions.

- Improve operational efficiency, ensuring financial stability and long-term sustainability.

The realities of today's media environment demand a regulatory framework that reflects current market dynamics. We urge the FCC to act swiftly to eliminate or modernize ownership restrictions, ensuring a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your time and consideration.

Sincerely,

Shaun Newell

Vice President/General Manager
WMBD-TV
Peoria, IL

Dear Chairman Carr,

On behalf of WNCN-TV CBS 17, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WNCN-TV CBS 17 is deeply involved in our local communities. We serve the Raleigh/Durham/Fayetteville areas where every week we produce over 41 hours of local News designed to inform, educate, and engage viewers. Our mission is to keep our viewers safe and help enhance the quality of their lives through our investigations, breaking news coverage, and accurate weather forecasts. Our weather team is at its best when the conditions locally are at their worst as we produce Weather Alert Days coverage to let viewers know 24-48 hours in advance when they need to take extra precautions.

In addition to our local news coverage, we also spotlight uplifting local stories and profile local businesses, local entertainment, and local restaurants with our lifestyle show. WNCN-TV CBS 17 is also out in the communities we serve, partnering with many great nonprofit organizations. The work we do together with the American Cancer Society, March of Dimes, Green Chair Project to name a few helped create significant improvements to the communities served.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

CBS17.COM
NEWS RALEIGH • DURHAM • FAYETTEVILLE

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WNCN CBS 17 are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

John O. Lewis
Vice President & General Manager
WNCN-TV CBS 17 Raleigh, North Carolina

April 3, 2025

Dear Chairman Carr,

On behalf of WNCT-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Since 1953, WNCT-TV has continuously provided free, over-the-air access to local news, weather, and lifesaving emergency information to residents of Eastern North Carolina. We broadcast live every day, providing our viewers with over 34 hours per week of important local and regional stories that impacts thousands of people in our area. Our service is essential particularly for those in underserved areas who rely on us for critical information.

Because our coverage area includes North Carolina counties along the Atlantic Ocean, WNCT-TV is a vital resource for the public during hurricanes. Hurricane preparation is crucial to safety, and in the days before landfall WNCT-TV provides information and resources for our viewers to prepare for the effects of a hurricane. As a storm grows closer to our region, WNCT-TV broadcasts wall-to-wall, staying on air constantly and without interruption until the storm threat in our area is over. Post-hurricane, flooding is a dangerous possibility, and WNCT-TV works diligently to provide up-to-date information on potentially life-threatening floods and to highlight recovery efforts. Through our broadcasts, we help connect people to resources during times of need.

Not only do we fulfill our commitment as a broadcaster to serve the public by providing needed news, information, and weather, WNCT-TV is invested in the local community. From helping raise much-needed funds for The Ronald McDonald House of Central and Eastern North Carolina during our annual telethon to hosting food drives in partnership with our local food bank, WNCT-TV is an advocate for those in need across our area. Additionally, we air thousands of Public Service Announcements each year, informing our viewers about everything from drug abuse to disease prevention.

And these needs do not just apply to Eastern North Carolina. Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like WNCT-TV are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WNCT-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive

dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Amy Doane
WNCT-TV Vice President & General Manager

Joe Abouzeid
VP and GM, WIVB-TV and WNLO-TV
Buffalo, NY

Chairman Brendan Carr
Federal Communications Commission

April 4, 2025

Dear Chairman Carr,

On behalf of WIVB-TV and WNLO-TV in Buffalo, NY, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to do away with the current rules that both cap the percentage of the country's TV households that a broadcast company may reach, as well as limit the number of stations a broadcast company may own in any single market. As you know, we are in the midst of an ever-evolving media landscape, and these onerous and outdated regulations place local broadcasters at a significant disadvantage as we attempt to compete with "Big Tech". The marketplace in which we compete has unfortunately become dominated by a few giant platforms that have no meaningful connection to our community.

Conversely, here at WIVB-TV, our community involvement is a core part of our mission statement. Our identity runs deep in the fabric of this community, being the first television station on the air in Buffalo, starting on May 14, 1948. We currently produce 62 hours of local news, weather, information and entertainment programming weekly. That number doesn't include the quarterly news specials we produce. Some recent topics have included fentanyl addiction in our area, as well as mental health and weather specials.

Speaking of weather, Buffalo can be a tough place to live in the winter. Over the past few years we have had record-breaking snow storms that have dumped several feet of snow on our area, putting people's lives and livelihoods at risk. One of these blizzards in 2022 knocked out power to 100,000 people, decimated emergency services, and sadly left 47 people dead. Operating 24/7 in these challenging conditions, we served our community by providing vital weather information that surely prevented more loss of life during that terrible time. I'm proud to say our weather coverage been voted most accurate seven-years running by Weatherate, a third-party company that measures the accuracy of forecasters in our market.

Mr. Chairman, as you know these are challenging times for local media and I'm happy to say that in an era when the local media landscape is facing significant headwinds, we at WIVB-TV continue to serve our community of Buffalo and Western New York in an unparalleled way. However, without relief of some of these regulations, I fear we will not be able to do so in the same robust manner that we are today.

Modernizing and eliminating some of these regulations would allow local broadcasters to better compete with these tech giants that have no local ties and that are not subject to these regulations. Also, we would be able to continue to provide the vital, life-saving news and information that is part of our core mission. We urge the FCC to take swift action to eliminate the restrictions on media ownership to ensure a level playing field that helps local broadcasters continue the important work in the communities we serve.

Sincerely,

Joe Abouzeid

VP and GM, WIVB-TV and WNLO-TV

Buffalo, NY

Dear Chairman Carr,

On behalf of WOOD-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WOOD-TV has been a cornerstone of the West Michigan region for 75 years. We take great pride in our role as a trusted source of news, information, and emergency updates. We are committed to keeping our community informed, broadcasting live seven days a week. With over 55 hours per week of live news and community programming, we provide unparalleled local coverage, including breaking news, severe weather updates, and in-depth reporting on local events.

WOOD-TV is deeply connected with our community and dedicated to making a direct impact throughout the year. As a local broadcaster, one of the most important roles we play is support for our non-profit organizations who help those in need. To highlight just a few, our "Community Spotlight" project profiles one local non-profit organization who is making a significant difference each month. The "Maranda Summer Park Parties", now in their 27th year, bring fun and resources to children attending summer school in our most challenged districts. "Football Frenzy Food Drive" raises awareness, funds and supplies for local food pantries and Feeding America West Michigan with over 30,000 lbs. of food gathered this past fall. We partner with the Salvation Army each holiday season on their "Angel Tree" project, ensuring a joyful time for families who don't always have the resources to spare. Maintaining free, over-the-air broadcast television to as many households as possible has never been more important, particularly for those in underserved areas who rely on us for critical information.

We are also committed to provide unique coverage of the people and events that make our area special. Our live broadcasts of the annual Amway RiverBank Run, 4th of July Fireworks, ArtPrize, The Santa Parade and Downtown Tree Lighting are just a few of those live broadcasts. We produce news stories and local specials that celebrate Black History Month, Women's History Month, Hispanic Heritage Month and Honor our Veterans in November. Along with our weekly political program "To the Point" with Rick Albin, we also produced local political specials, candidate forums and debates including the 2022 Governors Debate broadcast across the State of Michigan and the 2024 U.S. Senate Debate, which was also broadcast nationally by our parent company's cable news outlet, News Nation.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives. WOOD-TV has been the leader in this responsibility for years and continues to ensure that critical local news and emergency information remain accessible to the community. Despite this, stations like WOOD-TV face significant challenges due to outdated FCC rules that limit our ability to compete fairly in today's rapidly evolving media landscape. Without regulatory relief, we will struggle to make the necessary investments to sustain the high-quality journalism and programming our viewers need.

The current ownership restrictions were put in place to promote competition and diversity in broadcasting at a time when streaming technology did not exist and the major broadcast networks dominated television. However, the industry has changed dramatically. Streaming platforms, digital content providers, and Big Tech giants wield vast influence, reaching households across multiple devices without any of the restrictions placed on local broadcasters. The reach limitations imposed on television stations place us at a severe disadvantage compared to these digital giants, who are not bound by the same regulations.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

Today's media environment demands a reconsideration of outdated rules that no longer reflect current marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Julie Brinks
Vice President & General Manager
WOOD-TV/Grand Rapids, Michigan

April 3, 2025

Dear Chairman Carr,

On behalf of WOWK-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

As a leader in our local community, WOWK works hard to bring quality broadcasting to our viewers. WOWK will celebrate its 70th anniversary this year by serving the Charleston-Huntington DMA. Our call letters say much about the station, serving **O**hio, **W**est Virginia, and **K**entucky. Serving three states requires a commitment to each providing more than 36 hours per week of live news and community programming. WOWK also provides the only 7 pm newscast in the market. These investments deliver increased coverage of breaking news, sports, community stories, and weather.

In addition to our news and weather coverage, we are committed to the local communities. For over 25 years, WOWK has partnered with the United States Marine Corps annual Toy Drive, collecting toys that have gone to over 100,000 kids. WOWK and our sister stations in West Virginia helped raise over 6 million dollars for WVU Medicine Children's Hospital. Our annual food drive has delivered over $150,000 worth of food to families in our local community. Rolling up our sleeves is important to the team at WOWK, who have also participated in building five homes with Habitat for Humanity. WOWK works directly with countless local charities, including the United Way, Alzheimer's Association, Red Cross, Goodwill, and the Christian Appalachian Project.

Television viewers in our DMA of Charleston-Huntington depend on their WOWK to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are frequently the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

WOWK-TV 13 News
350 Quarrier Street, Charleston WV 25301
555 5th Avenue, Huntington WV 25701
Phone 304.343.1313

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one suffer because of archaic FCC rules and regulations that are not connected to current marketplace realities. In short, without regulatory relief, local television stations cannot continue making the investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting. They were conceived when streaming technology didn't exist, and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WOWK are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands reconsidering legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve. Thank you for your attention to this critical matter.

Sincerely,

Sean M. Banks
Vice President & General Manager

WOWK-TV 13 News
350 Quarrier Street, Charleston WV 25301
555 5th Avenue, Huntington WV 25701
Phone 304.343.1313

25 Catamore Boulevard
East Providence, RI 02914
401-228-1780

PATRICK WHOLEY
VICE PRESIDENT & GENERAL MANAGER

Dear Chairman Carr

On behalf of WPRI, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission(FCC) to eliminate the current rules that: (1)place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

This year marks the 70th anniversary of WPRI-12, which by itself is an incredible feat. We are so proud of what we have accomplished here in the market and what we represent, as the true news leader, community supporter, in the market. Consider some of the events that happened and if there wasn't WPRI-12 or local news to help provide information to the community. During the Covid outbreak, it was WPRI-12 that was on the phone daily with the Governor's office providing info and data to them to help support the latest information that they then provided in daily news briefs to Rhode Island… on our air - which we provided at no cost. Every day we did this to help protect and inform our community. We have been a support system of information through this entire Washington Bridge crisis that divides our state. Not to mention the countless northeast storms we have covered to help inform our community.

We provide over 70 hours of local programming to our community, free over the air, every week. It's not just the strongest news brand in the market, it's also lifestyle shows, community event programming, we are the market leader in political and debate coverage (often being picked up by Washington DC insiders for information in the northeast), we do 4 different local sports programs to help support that community, we had created forums in and around the Housing issue in New England, the drug problem in Rhode Island and many event programs around the education of children. Every year we do a telethon. This event, going on in its 50th year, has raised millions for a local school. For over ten years, we have raised hundreds of thousands for the Rhode Island Food Bank around the holiday season. Every June, we support the community with a station event in and around supporting multiple local charity organizations. Our employees have worked on over 80 different local events just this past year. We are also known as the station that holds our political leaders accountable. Now imagine if the type of commitment softened or worse, went away. Who would cover our community. And we are simply just one market among many threatened by these outdated rules. We have made a commitment to our market, to local news and information and that simply can't go away.

Thank you,

Patrick Wholey

Dear Chairman Carr,

On behalf of WQRF-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WQRF-TV has been a vital part of Rockford, Illinois, for 47 years. We take pride in being a trusted source for news, information, and emergency alerts. Our station is dedicated to keeping the community informed and linked, with live broadcasts airing daily. Each week, we provide 24 hours of local news and community programming, delivering top coverage of breaking news, severe weather, Amber Alerts, and in-depth local stories.

WQRF goes beyond delivering news—we actively strengthen our community. Every quarter, we broadcast thousands of public service announcements to highlight local charities and events. We deliver vital severe weather updates and host a weekly program, Bergstrom Stateline Quiz Bowl, to showcase local education. Our station is committed to progress, prioritizing our viewers' well-being. Ensuring free TV reaches as many households as possible remains a critical mission, particularly for underserved areas that depend on us for essential information.

As newspapers and radio stations shut down or scale back, local TV stations like WQRF have become more crucial than ever. Take the Rockford Register Star, for instance—it used to be a big news outlet but has dropped from 18,000 subscribers in 2018 to around 10,000 today. It's also stopped printing on Mondays and Saturdays, cut staff, and shifted to online-only, showing how traditional papers are disappearing. WQRF has stepped in to keep delivering essential news and alerts. Yet, outdated FCC rules hold us back in today's rapidly evolving media landscape. Without updates, it's hard to keep funding the strong journalism, in-depth investigations, and local shows our viewers rely on.

The original ownership restrictions were put in place to promote competition and diversity in broadcasting at a time when streaming technology did not exist and the major broadcast networks dominated television. However, the industry has changed dramatically. Today, streaming platforms, digital content providers, and

Big Tech giants wield vast influence, reaching households across multiple devices without any of the restrictions placed on local broadcasters. The reach limitations imposed on television stations place us at a severe disadvantage compared to these digital giants, who are not bound by the same regulations and continue to dominate the advertising and media distribution landscape.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

The reality of today's media environment demands a reconsideration of outdated rules that no longer reflect current marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Michael Silecchia
Vice President & General Manager
WQRF-TV Rockford, IL

April 4, 2025

Dear Chairman Carr,

On behalf of WREG News Channel 3 in Memphis, Tennessee I am writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

At the end of 2025, WREG will mark 70 years of serving Memphis and the surrounding area. From our first location in the south's grand Peabody Hotel to our current one on the banks of the Mississippi River, our reach extends to large and small towns in West Tennessee, Northeast Arkansas, and North Mississippi.

Every week, WREG produces well over 40 hours of community-focused news, lifestyle, and current issues programming. We staff our newsroom around the clock for viewers who rely on us to keep them safe, informed, and engaged in the community. We remain a strong voice in the area, enabling us to speak up and speak out for hundreds of thousands of people every day. From city council, school board and other government meetings, to local events, fundraisers, and partnerships, WREG is known as a leader viewers have always trusted.

In addition to our news and local programming efforts, we become a lifeline during local emergencies. During a recent severe weather event, The WREG team of Meteorologists prioritized keeping families prepared with warnings and

safety information. The team stayed on the air nonstop for at least 13 hours, tracking more than a dozen tornadoes that tore through our viewing area; and when the emergency is over, it doesn't mean our commitment ends there. As affected and sometimes devastated communities begin to recover and rebuild, we always follow up by giving a voice to storm victims and partnering with The Salvation Army and other charities to help those hit hardest.

The station has always prioritized helping people, even when it's not an emergency. I find it so important for our stations to do good for people in need. For example, one of our biggest annual fundraisers benefiting the local children's hospital has raised more than five million dollars to date. We've helped the Salvation Army, Boys and Girls Club of Greater Memphis, and other non-profit organizations enhance their fundraising efforts. We also make it a point every week to highlight local stories about people or other organizations who are doing meaningful work to assist people in the Memphis area.

Local TV stations like WREG are often the first source people turn to for news and information and, increasingly, the only remaining source of local journalism. As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech giants now dominating the advertising and media distribution sectors, local broadcasters

WREG are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Fran McRae
Vice President & General Manager

April 4, 2025

Dear Chairman Carr,

On behalf of WROC-TV, I am compelled to follow up with you regarding the *In re: Delete, Delete, Delete* proceeding and to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) impose a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, outdated regulations restrict local broadcasters' ability to compete against "Big Tech" in an increasingly digital, highly competitive environment that is dominated by a few giant platforms who have no meaningful connection to our local community.

For over 75 years, WROC has been privileged to serve the people of Rochester with best-in-class local news, weather, and information. With over 42 hours per week of live news and community programming, WROC provides unparalleled local coverage, including breaking news, Amber Alerts, severe weather updates, and in-depth reporting on local events. Our WROC team is deeply rooted and invested in the vitality of our community because Greater Rochester is our home. This collective commitment is the cornerstone for fulfilling our purpose as a local broadcast station -- to disseminate important local news, information, and impactful stories to our community.

Beyond the newsroom, WROC broadcasts thousands of public service announcements that support local not for profit organizations and community events. We produce local specials and leverage our broadcast reach to honor and celebrate Black History Month, Veterans Voices, Hispanic Heritage, and Remarkable Women. In partnership with the League of Women Voters, we host candidate debates and local forums to equip voters to make informed decisions on election day. We own the big events that bring our community together including the 2023 PGA Championship at Oak Hill, the 2024 Total Solar Eclipse, and, as Rochester's Official broadcast station for the Buffalo Bills, our beloved Bills. We also open our historic WROC studios to host local high school sports quarterly awards shows and to offer tours for schools and local community organizations.

As our local newspaper and local radio stations continue to scale back operations, our role as a local broadcaster has become even more vital. Once boasting a strong readership, circulation of Rochester's only daily newspaper, *The Democrat and Chronicle*, has dropped more than 70% in the last 10 years. And the unfortunate downsizing of their newsroom has contributed to less local news. As these trends continue, local broadcasters are increasingly threatened by archaic FCC rules and regulations that limit

Wendy A. Bello, Vice President and General Manager
WROC-TV, Nexstar Media Inc., 201 Humboldt Street, Rochester, NY 14610

our ability to compete fairly in today's rapidly evolving media landscape. Without regulatory relief, we will struggle to make the necessary investments to sustain the high-quality journalism and programming our viewers need.

The original ownership restrictions were put in place to promote competition and diversity in broadcasting during a time when streaming technology didn't exist, and major broadcast networks dominated television. However, the media landscape has changed dramatically. Today, streaming platforms, digital content providers, and Big Tech giants have immense influence, reaching households across multiple devices without facing the same restrictions as local broadcasters. The current reach limitations on television stations place them at a significant disadvantage compared to these digital giants, who operate without similar regulations and continue to dominate the advertising and media distribution space.

Eliminating or modernizing these regulations would:

- Empower local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to better compete with digital platforms that currently operate without the same reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan for future growth.

The reality of today's media environment demands a reassessment of outdated rules that no longer align with the current marketplace. We urge the FCC to take prompt and decisive action to remove these ownership restrictions, fostering a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your consideration and attention to this important matter.

Sincerely,

Wendy A. Bello
Vice President and General Manager
WROC-TV, Nexstar Media
Rochester, NY

250 International Drive
Spartanburg, SC 29303

Dear Chairman Carr,

On behalf of WSPA-TV 7, serving the Spartanburg/Greenville/Asheville region, I write as part of the *In Re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate outdated regulations that limit the percentage of the nation's television households a broadcast company may reach and restrict the number of stations a company may own in a local market. These antiquated rules are not only obsolete but also actively hinder the ability of local broadcasters to compete in today's highly competitive media environment dominated by powerful digital-first tech giants with no meaningful connection to our local communities.

At WSPA-TV 7, we are more than just a television station—we are a multimedia powerhouse dedicated to delivering essential local news and information across television, digital, and social platforms. With studios in Greenville and Spartanburg and a dedicated Capitol bureau in Columbia, we proudly produce 57 hours of locally focused newscasts each week. Our trusted journalists provide real-time severe weather coverage, investigative reporting, and critical updates that serve as a lifeline for our communities.

Beyond news, we are deeply committed to uplifting our region through year-round initiatives such as our Caring for the Carolinas campaign, which highlights nonprofit organizations and honors local change-makers and volunteers making a difference. We organize essential community outreach events, including Operation Warmth, Shred-A-Thons, food drives, and the Season of Hope Toy Drive—programs that directly impact thousands of families each year.

Local television stations like ours are the backbone of community journalism, providing the trusted, locally relevant content that national and digital platforms simply do not offer. Yet, despite our crucial role, we remain handcuffed by archaic FCC regulations that prevent us

250 International Drive
Spartanburg, SC 29303

from competing fairly against our Big Tech counterparts. As local newspapers shutter and radio stations struggle, broadcasters have become the last bastion of truly local journalism. But without regulatory relief, our ability to continue investing in high-quality news and public service programming is at risk.

The FCC's ownership restrictions were designed in a pre-digital era, long before streaming services, social media, and Big Tech monopolized the media landscape. *The world has changed, but the regulations have not.* While digital conglomerates leverage their unrestricted reach to capture advertising revenue and audience share, broadcasters like WSPA-TV 7 are unfairly constrained, creating a severe imbalance that threatens the sustainability of local journalism.

We implore the FCC to recognize the drastic disparity between traditional broadcasters and digital giants and to act decisively by eliminating or modernizing these outdated ownership caps. In doing so, you would:

- Empower local broadcasters to enhance community programming, improve technological infrastructure, and expand local news coverage.
- Level the playing field by allowing broadcasters to compete more effectively against digital platforms that currently operate without comparable restrictions.
- Strengthen operational efficiency, ensuring long-term financial stability and the ability to continue serving our communities with the high-quality journalism they depend on.

The media industry has evolved, and it is imperative that the FCC's regulations evolve with it. The continued viability of local broadcasters—and the future of local journalism—depends on swift action to survive. We urge the FCC to take bold steps to remove these

250 International Drive
Spartanburg, SC 29303

regulatory barriers and allow broadcasters the flexibility needed to thrive in the modern media environment.

Thank you for your attention to this important matter.

Sincerely,

Kenny Lawrence

Vice President & General Manager

Bill Evans
VICE PRESIDENT & GENERAL MANAGER
BillEvans@LocalSYR.com

Dear Chairman Carr,

On behalf of WSYR-TV, I am writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WSYR, we are deeply involved in the local community and the 8 county area that makes up the Syracuse DMA…

Every week, we produce over 38 hours of local news and community-centric content through our various local newscasts and local lifestyle show, Bridge Street. Our newsroom and bureaus are staffed 24/7 to cover the important, relevant local and regional stories that impact hundreds of thousands of people who depend on us to keep them informed. From important city council, school board and other governmental meetings to local events and campaigns, WSYR-TV is a reliable and trustworthy part of the fabric that makes up the communities our employees call home.

We are very active in the community supporting local charities to include the Salvation Army, United Way of Central NY, Food Bank of CNY, Rescue Mission, Red Cross, Francis House and many others.

We are also here to honor and celebrate the people and events that make our area special. Examples include our live broadcasts of the Syracuse St. Patrick's Day Parade in March, 13 days live from the Great New York State Fair, along with our Friday Night Fever coverage of local High School Football and Basketball games from August to March. We produce news stories and local specials that celebrate Black History Month in February, Women's History Month in March, Hispanic Heritage Month in September and Veteran's Voices in November. We have also produced local political specials, public affairs specials and candidate debates.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

Bill Evans
VICE PRESIDENT & GENERAL MANAGER
BillEvans@LocalSYR.com

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WSYR are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Bill Evans

Bill Evans
WSYR Vice President & General Manager

Dear Chairman Carr,

On behalf of WTAJ-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

At WTAJ, we are a vital part of our local community, best known for our comprehensive local news coverage. WTAJ News delivers five hours of live local newscasts daily, and our TV station has been a community cornerstone serving Central Pennsylvania for over 70 years. We have news offices with journalists in four communities in our region: Altoona, Johnstown, State College and DuBois. Our commitment to involvement is the heart of what we do, as we sponsor and actively participate in numerous charitable events. Our team is passionate about supporting initiatives like the American Cancer Society's Making Strides Against Breast Cancer, Big Brother Big Sisters Bowl For Kids Sake, Blair County Food Drive, Kick the Stigma (Mental Health Project), Special Olympics, and many others. We are there throughout the year highlighting people and events in our community such as our live coverage from Punxsutawney on Groundhog Day, live coverage of the Clearfield Fair Fireman's parade, and our live July 4th fireworks from DelGrosso's Amusement Park in Tipton. Our team brings High School football to our viewers with highlights of more Friday night games than anyone else. This just scratches the surface about how we are woven into the fabric of our small towns and communities.

Additionally, our local lifestyle show, Studio 814, is the only live local lifestyle TV program in the area. It brings local people on TV to showcase events, people, and places in our community, highlighting the what is special about our region.

Our community trusts us for accurate and timely information, especially during severe storms when we provide critical updates and stay on-air until the threats have passed. We are the preferred source for Penn State sports coverage with our Nittany Nation team, and our Your Local Election Headquarters really provides our viewers the extra details on the issues and the candidates, including statewide debate broadcasts.

As local newspapers decline in readership and production (shrinking number of days and pages), our reporters and journalists continue to deliver the content our community desires. In 2024, WTAJ News saw an increase in viewership compared to 2023, highlighting the ongoing demand for relevant local information.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather,

sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WTAJ-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Phil Dubrow
Vice President & General Manager

5000 Sixth Avenue, Altoona, PA 16602 | 814.942.1010 | Fax 814.946.8746
WTAJ.com

WTRF-TV
96 16th Street
Wheeling, WV 26003
Main (304) 232-7777
Fax (304) 232-4975

Dear Chairman Carr,

On behalf of WTRF-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WTRF-TV, we are proud to serve the Ohio Valley with a strong commitment to local storytelling, public service, and community connection. Each week, we produce more than 48 hours of local news, weather, sports, and lifestyle programming, including newscasts, coaches' shows, high school sports, and special features. Our extensive coverage makes WTRF-TV a trusted source of information and a vital part of our viewers' daily lives.

Our station plays a crucial role during severe weather events, providing lifesaving information across television, the web, and social platforms. Most recently, on April 3, 2025, severe thunderstorms swept through our region, prompting tornado warnings and dangerous wind gusts. WTRF-TV went live on-air around 3 a.m., providing continuous updates and safety guidance. Our website, WTRF.com, and our social media platforms delivered timely content throughout the event, keeping the public informed and prepared.

Earlier this year, January and February of 2025 brought a sustained arctic blast that disrupted daily life across the region. From school cancellations to road conditions and power outages, WTRF-TV delivered critical updates on-air and online. Our StormTracker 7 Weather Team, along with our reporters and digital producers, worked around the clock to provide accurate, timely information and community resources.

In April 2024, the Ohio Valley faced the worst flooding in over a decade. WTRF-TV delivered wall-to-wall team coverage, with our weather, news, and digital teams offering real-time updates and community response across all platforms.

On May 8, 2024, Hancock County experienced its first-ever recorded tornado, which caused significant damage to homes, barns, and farmland. WTRF-TV was there before, during, and after the event, offering real-time storm tracking, community impact stories, and critical recovery information.

WTRF-TV
96 16th Street
Wheeling, WV 26003
Main (304) 232-7777
Fax (304) 232-4975

Beyond our coverage, WTRF-TV takes pride in being an active community partner through numerous charitable and civic initiatives. We work together with local organizations to support events that make a meaningful difference, including:

Easterseals – Supporting children with disabilities through fundraising events like the inaugural Splashtacular.

Wheeling Chef's Auction – Benefiting Wheeling Health Right, which provides essential medical care to over 27,000 residents.

No One Walks Alone – Our annual Founder's Day of Caring event honoring veterans, where staff and community members walk 44 minutes in memory of the 44 veterans lost each day to suicide. Proceeds support Helping Heroes.

Ongoing partnerships with organizations like Catholic Charities, A Special Wish Foundation, local public schools, and the American Heart Association.

WTRF-TV is also proud to support Nexstar's national initiatives, producing impactful local stories that contribute to more extensive campaigns. This includes coverage of Vietnam War veterans and the ongoing fentanyl crisis in our state. WTRF-TV is contributing powerful local voices—highlighting the work of community groups, lawmakers, and those directly affected by these challenges.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

WTRF-TV
96 16th Street
Wheeling, WV 26003
Main (304) 232-7777
Fax (304) 232-4975

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WTRF-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
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The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Jim Dodrill

Jim Dodrill
Vice President & General Manager

Dear Chairman Carr,

On behalf of WTWO-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WTWO, we are deeply involved in the local communities we serve in the Wabash Valley of Indiana and Illinois.

We're proud to celebrate 60 years of broadcasting in the Wabash Valley, delivering over 22 hours of local newscasts and lifestyle programming each week. Our station is a trusted source for local and regional stories, breaking news, as well as coverage of local government meetings. We take pride in serving our communities, as many of us are born and raised here.

As the Wabash Valley's Local Weather Authority, WTWO has a critical role in keeping our viewers informed and safe. Just this week, we provided life-saving coverage as severe storms and tornadoes caused significant damage in many parts of our community. We offer continuous coverage, from storm warnings to on-the-ground reports showing the devastation. WTWO is the only station in the area with a tracking vehicle that provides live coverage within the storms. In 2023, we delivered non-stop coverage for days after an EF3 tornado hit our region, tragically claiming eight lives. Beyond reporting, we have raised funds for local and national storm victims through partnerships with the Red Cross and Salvation Army. Our Chief Meteorologist, Jesse Walker, also visits over 50 schools each year to educate students about weather safety.

WTWO stands out as the only station dedicated to covering local sports in the Wabash Valley. From the excitement of Friday night lights to the action of Indiana State Sycamores games, our coverage brings the community together and gives local athletes the recognition they deserve. Families enjoy seeing their children featured on TV, showcasing their talents. Each December, we also broadcast the First Financial Classic, further highlighting local sports.

Our commitment to the community goes beyond news coverage. Each year, WTWO donates nearly 1,000 books to local schools and has raised over $60,000 for the Humane Society through our Tail-A-Thon. We are also involved in providing backpacks and food for children in need during the summer, distributing food during the holidays, collecting coats for kids, and more. Our efforts are focused on supporting those who need it most in our communities.

At WTWO, we are passionate about honoring the remarkable people in our area. Every month, we highlight a hometown hero who has served our country, a local educator making a difference, and a standout sports player. We also celebrate Black History Month and our Remarkable Woman series. Last year, we introduced "6/60," where we recognize six individuals over the age of 60 who give back to our community. Additionally, we are proud to broadcast Indiana's longest-running Fourth of July parade.

WTWO is deeply committed to the Wabash Valley. Our 60 years of service reflect our dedication to keeping viewers informed, connected, and supported. We strive to make a positive impact in the communities we serve, and our ongoing efforts showcase the importance of local journalism and community engagement.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments

necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WTWO are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

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- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Tim Sanders
WTWO Vice President & General Manager

April 3, 2025

Dear Chairman Carr,

On behalf of WVNS-TV, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Serving both West Virginia and Virginia, WVNS provides more than 34 hours per week of live news and community programming. WVNS is also committed to the community beyond our local programming. For the past 8 years, our annual boot drive has raised over $160,000, with donations going to the local United Way, Sheriff's Department, and Fire Department. WVNS teamed up with our sister stations in West Virginia and helped raise over 6 million dollars for WVU Medicine Children's Hospital. WVNS and the United States Marines work together annually with the Toys for Tots of Southern West Virginia toy drive. The drive delivered over 17,000 toys to kids in 7 counties this year.

Television viewers in Southern West Virginia and Virginia recently depended on WVNS for extensive emergency coverage of multiple devastating storms. Our commitment didn't stop after the storms, as our team provided 8 days of flood coverage, partnering with many local businesses to gather much-needed supplies. In that short time, the station helped collect over 3,500 items and deliver them immediately to those who needed them. WVNS has often delivered vitally important lifesaving emergency information over the years. Local TV stations, like WVNS, are frequently the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, local broadcasters' role in disseminating accurate information is more critical than ever. Still, local stations like this one suffer because of archaic FCC rules and regulations that are not connected to current marketplace realities.

WVNS-TV 59 News
141 Old Cline Road, Ghent, WV 25843
304.929.6420

In short, without regulatory relief, local television stations will be unable to continue making the investments necessary to produce the high-quality news and information programming on which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting. They were conceived when streaming technology didn't exist, and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WVNS are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow independently, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands reconsidering legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Sean M. Banks
Vice President & General Manager

WVNS-TV 59 News
141 Old Cline Road, Ghent, WV 25843
304.929.6420

Dear Chairman Carr,

On behalf of WWTI-TV and The North Country CW, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WWTI and The North Country CW we are deeply involved in the local community of Northern New York.

Every week, we air over 33 hours of local news and community-centric content through our various local newscasts. We cover the important, relevant local and regional stories that impact on thousands of people who depend on us to keep them informed. From important city council, school board and other governmental meetings to local events and campaigns, WWTI-TV is a reliable and trustworthy part of the fabric that makes up the communities our employees call home.

We are very active in the community supporting local charities to include the Salvation Army, Rescue Mission, United Way of Northern NY, Northern NY Community Foundation, Hospice of Jefferson County, Food Bank of NNY, The Watertown Zoo and many others.

We are also here to honor and celebrate the people and events that make our area special. Examples include our Feed the Farmer stories highlighting agriculture and farmers, our Friday Night Football Fever coverage of local High School Football games from August to November along with severe weather coverage. We produce news stories and local specials that celebrate Black History Month in February, Women's History Month in March, Hispanic Heritage Month in September and Veteran's Voices in November.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

105 Court Street
Watertown, NY 13601
Phone 315.785.8850
Fax 315.785.0127

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WWTI and The North Country CW are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Bill Evans

Bill Evans
WWTI Vice President & General Manager

105 Court Street
Watertown, NY 13601

Phone 315.785.8850
Fax 315.785.0127

Dear Chairman Carr,

On behalf of Eyewitness News ABC 25 and The CW 7/WEHT and WTVW, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WEHT and WTVW we are deeply involved in the local community. Our resolute team produces 9.5 hours of local news per day. We use this time to keep the community informed of upcoming events, charitable organizations, local sports teams, but most importantly, we use this time to save countless lives. Our renowned and award-winning weather team has protected this community from the dangers of tornados and flooding for over 70 years. WEHT and WTVW are to "go-to" sources for the most accurate and up to date emergency weather information. The Tri-State area counts on us to keep them safe and informed. We take pride in protecting and educating this incredible community. We also take pride in providing comfort in the scariest of times. Our community trusts us, and we do not want to let them down.

As the world evolves, traditional forms of media are being pushed to the wayside. Newspapers are ceasing to print; radio stations are becoming nothing more than prerecorded banter and syndicated national talk shows with little local content. More than ever, we need local tv stations. Unfortunately, tv stations are suffering because of outdated FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely on day in and day out.

The current ownership restrictions originally intended to promote competition and diversity in broadcasting. The FCC created these restrictions at a time when streaming technology did not even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WEHT and WTVW are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

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- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

It is now more important than ever that the FCC reconsider the legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the incredible local communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Mitzi L. Coleman

Vice President & General Manager

Dear Chairman Carr,

On behalf of WSAV-TV, I'm writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WSAV, we are deeply involved in the local communities we serve in Southeast Georgia and the Lowcountry of South Carolina.

Every week, we produce over 40 hours of local news and community-centric content through our various local newscasts and local lifestyle show, The Bridge. Our newsroom and bureaus are staffed 24/7 to cover the important, relevant local and regional stories that impact hundreds of thousands of people who depend on us to keep them informed. From important city council, school board and other governmental meetings to local events and campaigns, WSAV-TV is a reliable and trustworthy part of the fabric that makes up the communities our employees call home.

We're also a lifeline for hundreds of thousands of our viewers who depend on WSAV-TV for severe weather and hurricane coverage along the southeast Atlantic coast. And we're here before, during and after the storms to prepare and warn our viewers, and to help them recover. The most recent examples of which included our wall-to-wall coverage of both Tropical Storm Debby and Hurricane Helene as they impacted our region last August and September. We partnered with the Red Cross and other local agencies to raise tens of thousands of dollars to help those impacted by both storms.

But lending a helping hand is something we do year-round. As a broadcaster, I feel one of the most important roles we play is to do good for those in need. Each spring, we collected over a ton of food for children who don't always know where their next nutritious meal is going to come from through our "School's Out for Summer Food Drive," benefitting Second Harvest Food Bank. Each July we collect and distribute thousands of school supplies in support of "Ready, Set, Go! Back to School," benefitting families in need. And we culminate the year by

partnering with the U.S. Marines Toys for Tots project for our “Holiday Hope” campaign, which ensures thousands of children will wake up on Christmas morning knowing that Santa and their hometowns love and care about them.

We are also here to honor and celebrate the people and events that make our area special. Examples include our live broadcasts of the MLK Day Observance Parade in January, Savannah’s world-famous St. Patrick’s Day Parade in March and the Veterans Day Parade in November, along with to our live Friday Night High School Football games from August to November. We produce news stories and local specials that celebrate Black History Month in February, Women’s History Month in March and Hispanic Heritage Month in September and October. We’ve also produced local political specials, candidate forums and debates including the only debate in the 2022 U.S. Senate campaign here in Georgia, which was broadcast nationally by our parent company’s cable news outlet, News Nation.

All this clearly demonstrates WSAV’s commitment to the communities and viewers we’ve served, informed and protected since we first signed on the air in February of 1956. As we close in on our 70th Anniversary celebration, we have plans to visit every county in our market to thank our viewers for their support and trust in our station.

It’s also part of the bigger commitment of our entire industry. Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn’t even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WSAV-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

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- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
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The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

J. David Hart

J. David Hart
WSAV Vice President & General Manager

WSAV-TV|1430 E. VICTORY DRIVE|SAVANNAH, GA|31404|912.644.6815

April 2, 2025

Dear Chairman Carr,

On behalf of Sioux City Iowa Television Station, KCAU, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KCAU we are deeply involved in the local community. We provide free over the air News and entertainment programming to over 160,000 households in northwest Iowa. We and our fellow broadcasters are the first responders in times of crises and severe weather keeping our viewers safe. In fact, last year on June 23rd a catastrophic flood raged through several of our communities resulting in loss of homes and possessions for thousands. Broadcasters in Sioux City stepped up and went with wall-to-wall coverage keeping those impacted and their families informed as to how and where to get help. My Parent company: Nexstar Media Group donated $10,000 to the local Flood relief effort. I saw nothing, no help at all from the big tech companies who are taking over the broader media landscape. In addition, KCAU is responsible for helping local community service projects generate over $1,000,000 in annual donations through on air and online promotional efforts. One project I am particularly proud of is the ALS benefit concert KCAU organizes and has run for the past 11 years. This project alone has raised over $500,000 since inception, which goes right back into our community to help people suffering with ALS. The Nexstar foundation has generously supported this event as well.

Nexstar Media Group, Inc.
5993 Gordon Drive | Sioux City, IA 51106
Tel: (712) 277-2345 Fax: (712) 277-3733
SiouxlandProud.com

Chairman Carr, over 30% of the television households in my market depend on free over the air broadcasters for important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. The Sioux City Iowa market is a rural market, meaning over 60% of the population resides in small rural communities outside of Sioux City. Many of our viewers do not have access to the internet or streaming services.

Our local Newspaper, The Sioux City Journal has gone from over 800 employees including carriers to just 20. They only print 3 editions per week now with national news making up most of the content. Two radio groups are still in business. One broadcasts satellite feeds, and the other group still has local announcers. The local Sinclair Broadcasting TV group cancelled all local news operations over a year ago.

Broadcasters are the last hope for rural America to get unbiased journalism from a local source. The role local Broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KCAU are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America.

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To remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

John Curry

Vice President & General Manager
KCAU, Sioux City, Iowa

Nexstar Media Group, Inc.
5993 Gordon Drive | Sioux City, IA 51106
Tel: (712) 277-2345 Fax: (712) 277-3733
SiouxlandProud.com

Dear Chairman Carr,

I am writing to you today to emphasize the critical role local broadcast stations play in the communities we serve and to advocate for much-needed deregulation that will enable us to compete on a level playing field with digital and technology giants. Specifically, I urge the Federal Communications Commission to eliminate the cap on the percentage of U.S. television households a broadcast company may reach and to lift restrictions on the number of stations a broadcaster may own in a single market. These outdated regulations are limiting local broadcasters' ability to grow, innovate, and effectively compete in today's rapidly evolving media landscape.

At KLBK-TV, we are deeply rooted in Lubbock and the South Plains, providing essential local news, severe weather coverage, and support for countless nonprofit organizations. Our work is not just about delivering news—it is about serving and protecting our community. Just last month, when an explosion occurred at a substation on the Texas Tech University campus, KLBK was live on the scene, urging viewers to stay away and providing evacuees with timely information on where they could find shelter. This is the kind of critical, real-time information that local broadcasters provide every day across the country.

As local newspapers and radio stations decline or transition to national formats, local television stations like KLBK are increasingly becoming the sole providers of local news. However, the financial sustainability of our industry is being threatened by regulations conceived in an era before streaming technology and digital media dominance. While Big Tech companies enjoy virtually unlimited reach with minimal regulation, local broadcasters remain restricted by outdated ownership caps. These restrictions place us at a significant disadvantage when competing for advertising revenue, audience engagement, and technological investments.

In order for local broadcasters to continue providing high-quality journalism, emergency information, and community programming, the FCC must modernize or eliminate these restrictions. Doing so would:

- Allow local broadcasters to expand and enhance their local news and community programming, ensuring that viewers continue to receive the critical information they rely on.
- Enable broadcasters to compete more effectively with digital and streaming platforms that face no comparable limitations on audience reach.
- Improve operational efficiency, ensuring long-term financial stability and continued investment in innovation and new technology.

The media landscape today is vastly different from when these ownership restrictions were first implemented. With the rise of digital platforms, streaming services, and tech giants dominating the media and advertising industries, local broadcasters need the flexibility to adapt and grow. We urge the FCC to take action in removing these outdated limitations, ensuring a fair and competitive environment that allows local broadcasters to continue serving the public interest.

Thank you for your time and attention to this critical matter. I appreciate your leadership and commitment to ensuring the continued strength of local broadcasting in America.

Sincerely,

Britt Milstead

Britt Milstead
Vice President & General Manager
KLBK-TV

Dear Chairman Carr,

On behalf of KMID-TV: ABC Big 2, proudly serving Midland/Odessa, TX, I am writing as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to remove the current rules that: (1) cap the percentage of the country's television households a broadcast company can reach, and (2) limit the number of stations a broadcast company can own in a single local market. In an increasingly digital media landscape, these outdated regulations hinder our ability to compete with "Big Tech." The marketplace is now dominated by a few large platforms that have no meaningful connection to our local community. **Broadcasters, however, remain a vital lifeline.**

Television viewers across the United States rely on their local TV stations for important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency updates. Local TV stations are frequently the first-place people turn for information and, increasingly, the only remaining source of local journalism.

KMID-TV is deeply embedded in the local community. We deliver 21 hours of weekly, local content to the Midland/Odessa, TX market, with a commitment to reflecting the needs of the community. From weekly job and industry franchises to spotlighting local businesses and supporting non-profits, we aim to serve the people of the Permian Basin in addressing their everyday needs and challenges. In my five years in the Basin, we've helped keep local businesses open, assisted first responders with the collection of life saving resources, and warned of approaching severe weather to protect densely populated areas.

As local newspapers and radio stations shut down or shift to national formats, the role of local broadcasters in providing accurate information is more critical than ever. However, local stations like ours are struggling due to outdated FCC rules that no longer align with current market realities. Without regulatory relief, local TV stations will be unable to continue making the necessary investments to produce the high-quality news and information programming on which our viewers depend daily.
As an operator, I face the challenge of remaining viable while continuing to provide high-quality news, emergency information, and community programming against Big Tech, which has unlimited and largely unregulated reach. Local broadcasters need the same flexibility to grow without restrictions as our Big Tech competitors.

The days of the "Big 3" broadcast networks are gone, and while current ownership restrictions once promoted competition and diversity, they predate the rise of streaming technologies. Big Tech has taken over both the advertising and media distribution sectors, reaching nearly every home through multiple devices. Our investigative reporting, breaking news coverage, and severe weather coverage come with significant investment in resources. **This commitment saves lives.**

Broadcasters like KMID-TV are now at a disadvantage due to the constraints of the current broadcast cap. Eliminating or modernizing these regulations would:

- Allow local broadcasters to expand and improve their local news and community programming while continuing to invest in new technology, innovation, and viewer services.
- Enable local broadcasters to better compete with digital giants that are not subject to similar restrictions.
- Improve operational efficiency, ensuring financial stability and more effective long-term planning.

Today's media environment demands a reconsideration of legacy rules that no longer reflect the realities of the competitive landscape. We urge the FCC to take swift, decisive action to eliminate media ownership restrictions and create a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Mark A. Garcia

Vice President & General Manager
KMID-TV / YourBasin.com
Nexstar Media Inc.

Dear Chairman Carr,

Let's start with the basics: The rules the FCC is currently enforcing are outdated. **Outdated.** They were created in an era when the media landscape was something you could still walk across without needing a GPS. That landscape doesn't exist anymore. It hasn't for a long time. So, let's talk about the two rules that need to go — the ones that place a cap on how many households a broadcast company can reach, and the ones that restrict how many stations we can own in a single market.

Why? Because in a world where the competition is not just cable networks anymore — but Silicon Valley giants with virtually unlimited reach and almost no accountability to the communities we serve — these outdated regulations are simply holding us back. They're preventing us from doing what we do best: serving local communities, delivering quality journalism, and competing in a world where the rules have changed — but we're still trying to play by the old ones.

At KSEE24 and KGPE47, we are embedded in our community. We don't just report the news; we live it. We spend 57 hours a week delivering local news. *Local news.* Every. Single. Week. That's not counting the dozens of local organizations we partner with year-round. From Girl Scouts to Ronald McDonald House Charities, from Fresno Compact to Catholic Charities, we're there, on the ground, helping to support and engage. **Because we're not just broadcasters; we're a part of this community.**

But let's get to the heart of the issue. Local TV stations are the lifeline to communities across this country. Whether it's breaking news, weather emergencies, or sports, local stations are the ones people turn to. We're the ones standing between our viewers and a world that's increasingly distant, disconnected, and detached from the communities we serve. And yet, local broadcasters are being forced to compete with one hand tied behind their backs by these **antiquated** FCC rules.

When local newspapers are folding, when radio stations are scaling back or going national, when trusted sources of information are evaporating into thin air, **we** remain. But the rules governing local broadcasters? They were written in a time when "streaming" wasn't even a word. A time when the only media giants were the Big 3 networks. Today, those same giants are now streaming behemoths — pouring money into digital platforms, reaching across multiple devices in every household. And yet, we, the local broadcasters, are shackled by restrictions that limit our ability to grow and innovate.

We're at a stark disadvantage. And it's not just a disadvantage in terms of reach — it's a disadvantage in terms of the very ability to survive in a marketplace that is no longer dictated by cable packages and broadcast towers. The digital age is here. And it's time the rules caught up.

Here's what needs to happen:

1. **Eliminate the cap on broadcast reach** — Let us expand our ability to provide the kind of in-depth local coverage people rely on.
2. **Remove the restrictions on ownership** — Allow us to better compete with the digital giants who have no such limitations.
3. **Ensure our financial stability** — By modernizing these regulations, you're ensuring that we can invest in new technology, hire more journalists, and deliver even more content.

Local broadcasters, like KSEE24 and KGPE47, are more than just channels on a TV screen. We're the heartbeat of our communities. We can't be expected to do more with less, especially when the industry around us has evolved into something we couldn't have predicted. It's time to act.

The rules are broken. And if we're serious about supporting local journalism, we need to act like it. **Swiftly. Decisively.**

We're asking you to lead. We're asking you to give us the flexibility to grow. To innovate. To compete. To continue serving the communities that depend on us.

Thank you for your time and attention to this crucial matter.

Sincerely,

Matt Morse
Vice President & General Manager
KSEE24 / KGPE47

Dear Chairman Carr,

I know you are aware of the role we play in delivering News and entertainment to our local community, which covers over 70 counties in Central Kansas to the Colorado border, for over 70 years . Our signals includes: KSNW, KSNL, KSNG, KSNK, KSNC and Telemundo Kansas. We produce over 35 hours per week of local newscasts on all stations that our viewers and your constituents rely on. The weather coverage we provide alone is life-saving on a regular basis and broadcasts daily on the five Audacy radio stations in our viewing area broadcast our forecasts daily for additional reach to our community.

The service we provide to our local community is critical as Newspapers like the Wichita Eagle has dramatically reduced their local coverage and staff and outsourced much of their content to the Kansas City Star. This has made our digital news and weather even more vital to present consistent local information on viewers phones and computers. As I tell our staff, we are now also the local newspaper of our forefathers for the region.

I write as part of the *in re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that:

(1) place a cap on the percentage of the country's television households that a broadcast company may reach; and

(2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KSN are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

833 N. Main St, Wichita, KS 67203-3606
(316) 265-3333

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Steve South
Vice President & General Manager
Nexstar Media Inc.

KSN-TV, Telemundo Kansas, KSN.com
Here For You
833 N. Main St.
Wichita, KS 67203
316-292-1152 Office
316-648-3752 Cell

Dear Chairman Carr,

On behalf of KTAL NBC6 Texarkana, Texas and KSHV TV Shreveport Louisiana, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KTAL & KSHV we are deeply involved in the local communities in our region, known as the Ark-La-Tex. So much so that the Louisiana Association of Broadcasters has recognized our involvement and efforts multiple times as their Community Station of the Year. We are proud of the projects and community work that we do. We have been recognized by the NAB twice for our efforts in their Service to America award. When you combine our passion for our communities with our commitment to story telling you have a great combination that "…serves the public interest." We have been recognized as having the most accurate weather forecasters for 13 years in a row. Our Chief Meteorologist is a long veteran of the market and we, along with our competitors, provide the only detailed weather alerts for our region. We have helped save lives in times of peril. As you are aware our "Big Tech" competitors for eyeballs has no way to replicate our weather coverage in the towns that we serve.

As local newspapers and radio stations go out of business or forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like KTAL and KSHV are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

318.629.6000
3150 NORTH MARKET ST.
SHREVEPORT, LA. 71107

Nexstar MEDIA GROUP, INC.

903.334.0285
3716 SUMMERHILL RD., SUITE 100
TEXARKANA, TX. 75503

As one of Nexstar's longest serving General Managers, across three markets, I can attest to the company's commitment to local journalism. No newscasts have been cancelled in any of the markets where I served. Rather, newscasts have been expanded or added across these stations and the Fox affiliate to which we provide shared services. I suggest Nexstar would continue to expand local content given the ability to expand its footprint through the elimination of the national ownership cap. Again, this is not anything that "Big Tech" is focused on. The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology did not even exist. It is a dichotomy to allow unfettered national access to one set of content providers ("Big Tech") while hamstringing 70-year-old legacy content brands (local TV stations). We are the last bastion of verifiable local content, and we proudly embrace our responsibilities as the Fourth Estate. The concept of media's ability to be a watchdog of the Government is long entrenched in American and European societies.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in innovative technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

Chairman Carr, I implore you and the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits all local broadcasters and the communities we proudly serve.

Thank you for your attention to this important matter.

Sincerely,

Mark McKay
V.P. & General Manager—KTAL TV & KSHV TV

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3150 NORTH MARKET ST.
SHREVEPORT, LA. 71107

Nexstar MEDIA GROUP, INC.

903.334.0285
3716 SUMMERHILL RD., SUITE 100
TEXARKANA, TX. 75503

Dear Chairman Carr,

On behalf of KARD Fox 14, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. These outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KARD Fox 14 TV, we are deeply involved in the local community. We produce 38.5 hours of local news per week – not counting the full time 7 days a week of digital content reporting. We also produce a daily local community show providing local organizations to publicize their events and charities (Louisiana Living).

We work hand in hand with St Jude and their Dream Home fundraiser to generate $850,000 that go directly to their Children's hospital. Our annual Veteran's Food drive has generated over 50 tons of canned food over the last 5 years going directly to those vets in need. We own and take great pride in the only market Doppler Radar that is in frequent use to warn viewers of tornadoes. We alert and confirm the National Weather Service of confirmed tornadoes! We are very active in providing local Marti Grus parade coverage and fundraisers for those in need. We provide Senators and House members on air coverage of their in-market visits and discussions

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like KARD Fox 14 TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Randy Stone
Vice President & General Manager
KARD Fox 14 TV

Mike Lee
VP/General Manager
8803 Woodway Drive
Waco, TX 76712

Dear Chairman Carr,

On behalf of Fox 44 KWKT and KYLE My28 in Waco, Texas, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at KWKT & KYLE we are deeply involved in our local community. In addition to the 12 hours per week of live, locally produced newscasts we broadcast from our studio, we are the media sponsor for the Waco Walk to End Alzheimer's that occurs every October. Our anchors and chief meteorologist emcee the live event, helping our local chapter to achieve their fund-raising goal for Alzheimer's research. We also sponsor the annual Mardi Gras Ball that takes place in February. Again, our top talent emcees this live event, which is the primary fund raiser for the Advocacy Center For Crime Victims & Children. We also work with Carter Blood Care to help promote their local blood drives where again, our news talent emcees their annual donor banquet. A new holiday project we started in 2024 is working with the Rainbow Rooms of Central Texas, which is a division of Child Protective Services. Rainbow Rooms help kids and teens that have been removed from a bad situation by supplying new clothes, school supplies and other essential items while they are away from home.

Our Waco-Killeen-Temple-Bryan/College Station, TX coverage area is frequently impacted by severe weather. Our goal and on-air promise to our viewers is "We Warn You First" as our state-of-the-art weather technology instantly and automatically displays warnings, watches and advisories when issued by the National Weather Service. Our "Storm Interceptor" vehicle is dispatched by our chief meteorologist when severe weather is active, to show our viewers live video of severe storms as they are forming and occurring. Fox 44 is often the first source Central Texans turn to for true, accurate, balanced, non-biased journalism.

Chairman Carr, as local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be

unable to continue making the kinds of investments necessary to continuing producing high quality news and information programing like I've outlined herein.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology *didn't even exist* and the few large platforms were the legacy Big 3 broadcast networks; however, I'm sure you'll agree, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like Fox 44 are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high quality local news, weather, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment clearly demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. I urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership, to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Mike Lee

Vice President & General Manager

WANE-TV
2915 West State Blvd.
Fort Wayne, IN
46808
260.481.1515
CBS Affiliate

Dear Chairman Carr,

On behalf of WANE-TV Fort Wayne, Indiana, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WANE-TV Fort Wayne, Indiana, we are deeply involved in the local community and serving Northeast Indiana and Northwest Ohio for 70 years. Efforts like our Founders Day of Caring Food Drive for Community Harvest Food Bank brought in 17K #s of Food that result in 14,000 meals for families in our community. We deliver over 30 hours a week of local News and other programming. Also, we deliver State News through our Nexstar Sister Station in Indianapolis. We cover important Local and State Debates. We deliver Federal News through our D.C. News Bureau. Our weather coverage saves lives. Road Construction, Traffic Reporting, Police and Fire are all pillars of our coverage plan. WANE TV takes great pride in supporting and lifting organizations in our community. Fort4Fitness Fall Festival is 1 of many that enhances lives. As people unplug these days, WANE-TV is still connected to everyone through every platform and Wane.com website delivers news and information. WANE-TV is truly everywhere serving those that count on us.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local

television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WANE-TV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Thomas Antisdel
Vice President & General Manager

WBTW News13 Coverage You Can Count On.
101 McDonald Court, Myrtle Beach, SC 29588 / Tel: 843-293-1301 / www.wbtw.com

April 2, 2025

Dear Chairman Carr,

On behalf of WBTW News13, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape has drastically changed, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace, dominated by a few giant platforms with no meaningful connection to our local community.

Here at WBTW we are deeply invested in our communities, and we have been the most watched and trusted Local News source for over 70 years. Today we produce over 9 hours of local news each weekday, with additional live local news every weekend morning and evening.

Our work has encompassed 70 years of local hurricanes, tornadoes, severe storms, and floods to keep our community safe and in touch. Our coverage of national emergencies like the COVID pandemic, 9/11 attacks, and all the wars and military actions ensure important information gets to our viewers in a timely manner. We have also been a valuable tool for our elected officials to communicate with their constituents from wherever they may be working.

We are also proud of our decades of community service and our involvement with the cities, counties, municipalities and literally hundreds of important charities and community service organizations that make our region unique.

Television viewers in South Carolina and in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers cease publication and radio stations go out of business or adopt a national format, the role local TV broadcasters play in disseminating accurate information is more important than ever. Unfortunately, local stations like this one are suffering because of outdated FCC rules and regulations that simply do not reflect today's marketplace realities. Without significant regulatory relief, local television stations won't be able to continue the level of investment needed to produce the amount and quality of local news and information our viewers have grown to rely on every single day.

The current ownership restrictions were created long before streaming technology and the internet existed, and the big-3 broadcast networks were the only game in town. The realities of today find the giant streaming platforms, digital content providers, and Big Tech are now dominating the advertising and media distribution industries, with little to no local investment or community service. Local broadcasters like WBTW News13 are at a huge disadvantage. The outdated constraints of the broadcast ownership cap severely hinder our station when competing against the unlimited reach of the Big Tech giants available in every household in America. For our industry to remain viable and for us to continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts have been able to do.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment, and the needs of our viewers and your constituents, demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to allow a level playing field that benefits both local broadcasters and the communities we serve.

I appreciate your attention to this very important matter.

Sincerely,

Robert Raff

Robert A. Raff
Vice President & General Manager

WCMH-TV
3165 Olentangy River Road
Columbus, OH 43202

Larry Cottrill
Vice President/General Manager

Dear Chairman Carr,

On behalf of NBC4/WCMH, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WCMH is a community-oriented company striving to bring the best in broadcasting to our viewers. This commitment can be seen in the many "Firsts" that only WCMH can claim.

- First TV station to broadcast in Columbus (April 1949)
- First to use weather radar in Columbus
- First telecast of Ohio State University Football, Basketball, and Track
- First color broadcast in Columbus
- First to use real time closed captioning of live local news and programming
- First local weekly political news program
- First to deliver live news and on demand news using an App in the market
- First to deliver news at 4am, 4pm, and 7pm in the market

WCMH produces a market leading 59 hours of local news and programming per week, including the market's first Sunday morning political program, *The Spectrum*. Plus, unique local programming like *Daytime Columbus* which showcases local businesses and organizations, allowing viewers to remain engaged in their communities. In addition, WCMH coordinates with local sponsors to create community specials focusing on subjects like: Alzheimer's, Autism, Pregnancy & Infant Loss Awareness, Suicide Prevention, and many others. We also air important programming throughout the year celebrating Hispanic Heritage, Black History, and Remarkable Women and their roles in shaping our community.

WCMH is the only local station with a dedicated Statehouse reporter, covering Ohio's legislature, 52 weeks a year. Providing viewers an opportunity to know and understand the legislation and news coming from Ohio's Statehouse. For 44 years, WCMH has been proud to sponsor and broadcast the mid-west's largest Fireworks Show, Red, White, & Boom! Here at WCMH we are deeply involved in the local community with our: Firefighters for Kids Toy drive, Stuff the Back-Pack for back to school needy families, Mid-Ohio Farm at NBC4 (3 acre farm that sits on the back of our studio property serving our local neighborhoods working with the Riverview International Center), African American Male Wellness Walk, Uplift Her, and many, many more worthy causes.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism. 2024 was the worst year in history for tornadoes in Ohio, with a total of 74 reported. The worst struck the Indian Lake region on March 14, leaving a nearly 32-mile path of destruction. We were the first on air alerting viewers of the Tornado Warning and the impending trouble and we continued for several hours, live, on-air. Not just for that particular severe weather event, but for every one of them that impacted the Columbus DMA. Viewers rely on WCMH for dependable weather coverage that keeps them safe, and we deliver, every time.

Television viewers across Columbus and the surrounding communities depend on WCMH to deliver the local news, weather, and emergency information that directly impact their daily lives. As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television

WCMH-TV
3165 Olentangy River Road
Columbus, OH 43202

Larry Cottrill
Vice President/General Manager

stations will be unable to continue making the kinds of investment necessary to produce the high-quality news and information programing upon which our viewers rely on daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WCMH/NBC4 are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Larry Cottrill
Vice President/General Manager

Dear Chairman Carr,

On behalf of FOX8/WGHP, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at FOX8/WGHP we are deeply involved in the local community. In addition to the thirteen (13) hours of local news we produce every Monday-Friday (which includes lifesaving vital weather information for our viewers), we also produce ongoing feature segments such as: *Made in North Carolina*, *What's Right with our Schools* and *Spotlight on The Community Foundations.* Often, these segments are viewers' first introduction to life changing services in their community that they may not otherwise know exist.

Our locally produced program, *Swing State,* focuses on politics in the Triad region and across the state by welcoming to our studio's members of our Congressional delegation and State leaders. FOX8/WGHP has moderated and broadcast Mayoral, Congressional, Gubernatorial and Senatorial debates locally in our viewing area, as well as across the state of North Carolina via sharing with our Nexstar owned broadcast television stations.

As the most watched television station in the Triad, FOX8/WGHP has the unique ability and responsibility to help our community grow and also to help illuminate needs, and most importantly, address them. From disaster relief telethons following local tornadoes, to our ongoing reporting and messaging from Western North Carolina in the wake of Hurricane Helene, we are a loud and focused voice for immediate electronic information and aid. We not only serve as the first and last warning to our community in times of life-threatening weather situations, but we also address how to help our neighbors impacted by these disasters.

Each year FOX8/WGHP helps (via our loyal viewers) raise millions of dollars in donations and goods via our *Community Baby Shower* (mothers in need), *Give a Kid a Coat* (warm coats available for free all year long), *Gift for Kids* (Christmas gifts for kids) and the *FOX8/Old Dominion Holiday Concerts* (food pantries). We work with multiple charities and non-profits such as The Salvation Army, March of Dimes, T1D (formally JDRF), Special Olympics, Autism Awareness, ALS and more.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still,

local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like FOX8/WGHP are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

James E. Himes, Jr.
Vice President & General Manager

Dear Chairman Carr,

On behalf of WJHL and ABC Tri-Cities, **I write as part of the *In re: Delete, Delete, Delete*** proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WJHL and ABC Tri-Cities are deeply involved in the local community, and we have been for over 70 years. We are a trusted source for local news and weather, and we take pride in keeping our 17 county 3 state region informed on breaking news and severe weather updates along with in-depth reporting on local events happening across our coverage area. We provide over 54.5 hours of news a week, just launched a CTV app wjhl+ and offer the number one local website/news app, wjhl.com in the market.
Beyond our newsroom, WJHL is an exceptional member of this community and tell the stories that matter most. Over the past several months and with the recent flooding our communities needed our help more than ever. We joined forces with United Way and offered a phone bank where we ended up raising over $1.7 million dollars that stayed in our market to help with flooding relief inside our communities. We later came back and did an informational telethon to answer questions on air and online as well as provide more information on where to get the help that was needed by so many.

Television viewers in the Tri-Cities and surrounding communities depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local

television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WJHL and ABC Tri-Cities are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Paula Jackson
Vice President & General Manager
WJHL, ABC Tri-Cities and wjhl.com

To: Chairman Brendan Carr
Fr: Jesse Grear VP/GM WKRG/WFNA jgrear@wkrg.com
Re: Thanks and Delete, Delete, Delete

Dear Chairman Carr,

Just wanted to say Thanks once again for taking your time to visit our station back in February and giving us an opportunity to speak with you about the issues facing our industry.

I'm writing today in reference to your "Delete, Delete, Delete" initiative as this initiative will greatly help in keeping our industry viable into the future. As Broadcasters we will need all the help we can get in order to compete and continue to provide Local News, Emergency Weather information, and provide community support throughout our coverage area. As discussed in our meeting, our market spreads across 3 states and the resources we need to be able to serve this entire area are numerous.

How do we compete with Big Tech and even the Cable industry when regulations strap our ability to invest in new technology and services for our viewers? And Broadcasters are the only ones in this group that can provide vital lifesaving information to the viewers at the local level as well as support all of the non-profits that serve those in need. Our stations raise awareness as well as raise money and supplies for groups like The Salvation Army, with our Magical Christmas Toy Drive collecting thousands of toys each year for underprivileged families that otherwise wouldn't have Christmas, and helping them ring the bells for the Red Kettle drive. We help "Feeding America" with our Local "Stock the Pantry" drive collecting thousands of pounds of food for children in our coverage area that cannot afford food during the Summer months when they're not in school, along with countless other organizations that try to make life better for everyone. Not one Cable provider or Big Tech company provides any local help for anyone across any television market in the country.

Our financial stability depends on being able to compete, and quite frankly, the current regulations restrict our ability to grow and compete. The current regulations are outdated and cumbersome for us, and we need your help. I know from our conversations that you are aware and want to help. I just wanted you to know how much we appreciate you listening and working to take action.

Thanks again for all you do and are trying to do!

All the Best,

Jesse

Dear Chairman Carr,

On behalf of FOX 25/48/WLAX/WEUX, I write in response to the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that place a cap on the percentage of the country's television households that a broadcast company may reach and limit the number of stations a broadcast company may own in any single local market. As the media landscape evolves, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WLAX/WEUX we are deeply committed to serving the local communities of La Crosse & Eau Claire, Wisconsin. We fulfill this commitment through our daily broadcast of First News at 9, the areas only primetime newscast, as well as our website WIProud.com. Through these outlets, we inform citizens of the Coulee Region and Chippewa Valley with, at times, life-saving severe weather alerts. In 2024, our area saw an unusual weather pattern, resulting in record numbers of flood warnings and tornado warnings. During these severe weather events, viewers turn to us for critical updates and advice on how to prepare. This crucial form of coverage cannot be replicated by national media platforms, social media, or AI and is a perfect example, in a long list of reasons, as to why the financial health of local broadcasters is paramount in today's rapidly changing media landscape. Our staff is comprised of 20 La Crosse county residents, 5 Chippewa County residents, and 3 Trempealeau county residents. Combined, we serve on 6 non-profit boards, 10 non-profit committees, and have dedicated approximately 200+ hours of our collective time volunteering in our local communities and churches. In addition to this, we serve key roles and/or helped create several annual community events such as the Gateway Area Scouting Gala Fundraiser, Family Fun Expo, Youth Outdoor Fest, Play it Forward Equipment Drive, and much more. The causes we support and participate in result in well over six-figures of donations in support of charitable organizations in our community. We truly live, eat, and serve our community, making us a far more appropriate source of local news and local programming than Big Tech.

Television viewers in communities across the region depend on us to provide them with important information that directly impacts their lives, including news, weather, local sports, and often lifesaving emergency information. Local TV stations are often the first-place people turn to for news and information and, increasingly, the only remaining source of local journalism.

Beyond our commitment to informing viewers and serving our community, WLAX/WEUX also plays a vital role in producing content unique to our region. Annual series such as County by County, Harvesting Heroes, Student Athlete Spotlight, First News Junior, Local Legends, Destination Series, Rivertown, and so much more place a spotlight on the best, most uplighting stories in our communities. Through these outlets, we celebrate our culture, people and highlight all things that make Western Wisconsin unique.

As the La Crosse Tribune and Leader Telegram produce less and less local content and local radio stations like La Crosse Media Group are forced to consolidate with national outlets, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like WLAX/WEUX are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WLAX/WEUX are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

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Find us on Facebook

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Eau Claire, WI 54701
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Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Cory Gylock

Cory Gylock
Vice President & General Manager

Dear Chairman Carr,

As the VP/General Manager of WPHL-17, in Philadelphia, PA, I write this note as part of the *In re: Delete, Delete, Delete* proceeding. As an instrumental voice in the fifth largest market in America, I urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As you know, the media landscape is rapidly evolving, and those regulations are dramatically hindering the ability of local broadcasters to compete against "Big Tech". Our landscape has become increasingly digital, and this highly competitive marketplace has become dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WPHL-17, we are deeply involved in the local community… we air five hours of local news each weekday, commit ourselves to the coverage of any and all local events, and work day and night to ensure we are there to inform and protect the people in our local market during severe weather events like tornadoes, hurricanes, etc. We also dedicate an entire department to doing charitable and community work within the Philadelphia region.

It goes without saying that our viewers depend on us to provide them with important information that directly impacts their lives. They come to us for local news, weather, sports information, and often lifesaving emergency information. In fact, Local TV stations are often the first or only place people turn when they need information that directly impacts them. And increasingly, with the decline of other local media outlets, we are the only remaining source of local information left in journalism.

As local newspapers and radio stations go out of business or have become so financially strapped that they are now forced to limit their operations or adopt to a more national format, the role local broadcasters play in disseminating accurate information is more important than ever. And despite the outdated FCC rules and regulations, local stations are trying to continue our work of informing the local residents when they need us most. However, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information upon which our viewers rely daily.

Originally, the current ownership restrictions were intended to promote competition and diversity in broadcasting. However, these restrictions were conceived at a time when streaming technology didn't even exist, and television was dominated by the legacy Big 3 broadcast networks. Those days are long gone. Now, streaming platforms, digital content providers, and other technology and social media dominate the advertising and media distribution sectors, and local broadcasters like WPHL-17 are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark in comparison to the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain stable, viable and to continue to provide high-quality local news, emergency information, and to continue to make a positive impact in our community, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services. This is of huge benefit to our local communities.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach. Essentially, it levels the playing field and allows broadcasters to compete.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

Given the reality of today's local media landscape, a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics needs to be had. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Lloyd Bucher
Vice President & General Manager, WPHL-17, Philadelphia, PA

April 2, 2025

Dear Chairman Carr,

On behalf of WRIC-TV, I write as part of the In re: Delete, Delete, Delete proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

WRIC-TV has been a cornerstone of the Richmond, Virginia community nearly 70 years. We take great pride in our role as a trusted source of news, information, and emergency updates. Our station is committed to keeping our community informed and engaged, broadcasting live seven days a week. With over 42 hours per week of live news and community programming, we provide unparalleled local coverage, including breaking news, Amber Alerts, severe weather updates, and in-depth reporting on local events.

Beyond our newsroom, WRIC is deeply involved in strengthening the fabric of our community. Each quarter, we air thousands of public service announcements dedicated to supporting charitable organizations and community events. From covering severe weather to amplifying the voices of local leaders and organizations, WRIC continues to make meaningful advancements and investments in the well-being of our viewers. Maintaining free, over-the-air broadcast television to as many households as possible has never been more important, particularly for those in underserved areas who rely on us for critical information.

Television viewers across Richmond and the surrounding communities depend on WRIC to deliver the local news, weather, and emergency information that directly impact their daily lives. As local newspapers and radio stations continue to shut down or scale back operations, the role of local broadcasters has become even more vital. For example, the Richmond Times-Dispatch, once a dominant source of local news, has seen its print subscriber base decline significantly, falling from 37,000 in 2022 to under 23,000 by 2024. Additionally, the paper recently announced plans to vacate its downtown headquarters, further signaling the contraction of local print journalism. As these traditional sources diminish, WRIC has stepped up to fill the void, ensuring that critical local news and emergency information remain accessible to the community. Despite this, stations like WRIC face significant challenges due to outdated FCC rules that limit our ability to compete fairly in today's rapidly evolving media landscape. Without regulatory relief, we will struggle to make the necessary investments to sustain the high-quality journalism and programming our viewers need.

The original ownership restrictions were put in place to promote competition and diversity in broadcasting at a time when streaming technology did not exist and the major broadcast networks dominated television. However, the industry has changed dramatically. Today, streaming platforms, digital content providers, and Big Tech giants wield vast influence, reaching households across multiple devices without any of the restrictions placed on local broadcasters. The reach limitations imposed on television stations place us at a severe disadvantage compared to these digital giants, who are not bound by the same regulations and continue to dominate the advertising and media distribution landscape.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance local news and community programming, ensuring continued investment in innovation and viewer services.
- Allow local broadcasters to compete more effectively against digital platforms that currently operate without similar reach restrictions.
- Improve operational efficiency, ensuring financial stability and the ability to plan effectively for the future.

The reality of today's media environment demands a reconsideration of outdated rules that no longer reflect current marketplace conditions. We urge the FCC to take swift and decisive action to eliminate these ownership restrictions, ensuring a fair and competitive environment that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

Steve Blanchard
Vice President & General Manager
WRIC-TV Richmond, Virginia

Dear Chairman Carr,

On behalf of WWLP, Springfield, Massachusetts, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WWLP we are deeply involved in the local community…
> We do over 40 hours a week of local news focused specifically on our region
> Our newsroom is staffed 24/7 to cover breaking news any time of day
> We provide emergency weather coverage during storms and other inclement weather events
> Out Investigative Team digs into local problems to help bring them to light
> We offer solutions to local issues and concerns with special reports
> Our weekly "In Focus" program delves into local stories in an in-depth fashion featuring interviews with key policy makers and business leaders
> We partner with over 20 local charitable organizations to promote events throughout the year to help better the quality of life in Springfield and the surrounding area
> We air thousands of public service announcements at no charge to assist in delivering positive community messages
> We collect thousands of toys each year for our "Toys for Tots" drive partnering with the Marines in our area.

Our TV station is one of the few media outlets in the Springfield area delivering locally focused news. In order to continue, TV stations need a relaxation of out-of-date and out-of-touch FCC rules and regulations to make the kinds of investments needed to operate at a high level. WWLP is the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations

like WWLP are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WWLP are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

R. M. Simone

Robert M. Simone
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Dear Chairman Carr,

On behalf of FOX59/WXIN and CBS4/WTTV, I am writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current out of date rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. The media landscape has changed dramatically, and these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" platforms who have no limit on their reach and that have no meaningful connection to our local community. An increasingly digital marketplace has become dominated by a few giant platforms have deeply impacted our ability to compete. The time for action is now before local television media goes the way of countless local newspapers.

Here at Fox59 and CBS4 we are deeply involved in the local community. We are the prima facie example the positive impact of a duopoly of two big 4 affiliates who have expanded news coverage, increasing our service to our community, and provided special coverage that will never be seen on Big Tech streamers. We produce almost 100 hours of news weekly between our two stations, as well as local sports coverage including the Indianapolis Colts and Indianapolis Indians (AAA). Our continuing series of news specials and coverage have spotlighted Remarkable Women in the community, as well as the contributions of veterans and those in the Black and Latino communities. Last year we produced Governor's debates for the primary and the general election that we shared at no cost with a number of stations throughout the state of Indiana. Our biannual Pack the Pantries telethons have raised hundreds of thousands of dollars to support food insecurity in the market. We're still waiting to see support for local charities from Instagram or Hulu.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Just recently we went split screen during the NCAA's Elite Eight games to provide updates on tornadic activity in our viewing area. The next tornado warning on Netflix or You Tube will be the first.

Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism. As local newspapers go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. The recent Delphi murders trial in a local small community with big impact that shook the community is an example. We were there 24/7 for the trial, with our reporters sleeping outside of the courthouse to ensure we were there to cover the trial as it happened. We were

the first to air with the verdict for Indiana viewers. It will be years before one of the streamers premieres a documentary on the trial, with information that
parrots what we already provided in a timelier fashion. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. Without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like FOX59 and CBS4 in Indianapolis are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. News coverage is expensive to produce. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. Democracy dies when the bright light of local media is extinguished. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your time and attention to this important matter.

Sincerely,

Dominic Mancuso

Vice President & General Manager
FOX59/CBS4